

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

:

v.

:

CRIMINAL NO. 23-016-JLS

BHASKAR SAVANI et al.

:

GOVERNMENT'S NOTICE TO THE COURT

The government makes this filing to inform the Court and the parties of a post-indictment inadvertent release of documents to the trial team, which documents had been preliminarily screened for privilege, but not yet fully reviewed for privilege. The filter team has reviewed these documents, has assessed that some may not be privileged at all, and those that are arguably privileged are nevertheless irrelevant, thus accruing no prejudice to the already-indicted defendants. As detailed below, this filing is made by the filter review attorneys, who have investigated the spillage. Along with this filing, we are providing the Court and counsel with a separate sealed filing containing the documents determined to be potentially privileged or work product¹ that were opened by the current members of the trial team (Sealed Exhibit A). Also attached to this Notice is a list of the bates-stamp numbers of all 2,382 documents that were opened by any person currently or formerly associated with the government, whether or not those documents were determined to be potentially privileged/work product, to aid the defense should the defense choose to raise the status of any of those documents with the Court.

¹ Some of the spilled documents are potentially privileged and others appear to be potential attorney work product. As the Court is aware, the protection afforded attorney work product is not absolute. Attorney work product is entitled to a lower level of protection than privileged communications, depending on the extent to which the work product contains the attorney's mental impressions or conclusions. For purposes of this Notice, we are not distinguishing between potentially privileged communications and potential work product.

I. FACTUAL BACKGROUND

From February 2009 through in or about November 2021, the defendants in this case, Bhaskar, Arun and Niranjan Savani, Aleksandra Radomiak and Sunil Phillip, with others, engaged in a pattern of racketeering activity, including: (i) visa fraud; (ii) wire fraud involving the Medicaid program; (iii) concealment money laundering; (iv) transactional money laundering; (v) obstruction of justice; and (vi) mail fraud involving the implantation of unapproved medical devices.

The defendants undertook all of this unlawful conduct in an effort to sustain and grow their sprawling dental empire. That enterprise, based here in the Eastern District of Pennsylvania, included general and specialty dental practices throughout the United States, back office service operations in Pennsylvania and India, a dental supply business, real estate operations, and the Osseolink dental implant supply company.

The racketeering enterprise conducted through the defendants' far-flung dental venture extends back at least as far as February 2009. The defendants' criminal activities required a compliant and underpaid workforce to staff their dental offices and backroom operations. The defendants met this need through fraudulent manipulation of the H1-B foreign worker program. Through false applications to the U.S. Department of Labor and the Customs and Immigration Service, the defendants obtained permission to employ foreign workers in highly technical specialized fields such as bioengineering and chemistry. Instead, however, the defendants employed their foreign workers in entirely different endeavors, such as dental office managers, billing managers, and a janitor. Worse yet, the defendants unlawfully demanded that their employees kick back to the Savanis a portion of their salaries as well as the fees that the Savanis were legally obligated to pay on the foreign workers' behalf. Sometimes the defendants extracted these illegal payments in the form of cash or check and at other times it was in the form of under-the-table employment from spouses who were prohibited from working in the United States. The

defendants directed and encouraged their employees to deceive government agents and agencies about the circumstances of their employment, ultimately resulting in the making of perjured testimony before a federal grand jury.

To extract additional funds for their own personal benefit and for the benefit of their enterprise, the defendants carried out a campaign of submitting false claims to health insurance companies, including the Pennsylvania Medicaid program through the Commonwealth's Medicaid contractors. This persistent scheme, which the defendants euphemistically labeled "supervisory billing," involved submitting claims for reimbursement that identified an approved medical provider as the treating dentist although the services (assuming they were actually performed) had been performed by a different individual, often one who was unapproved or uncredentialed by the company to which the claim had been submitted.

When this repeated deception was discovered, the Savani dental practices were terminated from participation by certain Pennsylvania Medicaid contractors in late 2012. Rather than limit themselves to private insurers that had not excluded them from participation, the defendants sought to continue profiting from the Medicaid program by establishing two nominee dental practices. Although they in fact controlled both practices behind the scenes, the defendants and their co-conspirator nominee dentists maintained and represented that these practices were independent of the Savanis in general, and Bhaskar Savani in particular. Through this deception, the defendants reacquired lucrative Medicaid contacts. Worse yet, the defendants continued to submit false and fraudulent claims to various insurance companies.

To perpetuate the fraud and avoid detection, the defendants concealed and laundered income to their companies and themselves personally, evaded taxes, and used their companies to fund their lavish lifestyles through fraudulent business expenses such as the purchase and upkeep of vehicles and real estate. The defendants also sought to increase the profitability of their dental

implant company, Osseolink, by substantially altering the design and functioning of the FDA approved product that the company produced. However, rather than comply with the mandatory practices required by the FDA to obtain approval for these alterations, the defendants engaged in an unapproved and unregistered program in which their own patients were the unwitting test subjects for the defendants' surgical implantation experiments.

II. PROCEDURAL HISTORY

On January 18, 2023, a grand jury sitting in this district returned a 42-count indictment charging 12 defendants with a variety of crimes, including an obstruction of justice conspiracy, in violation of 18 U.S.C. § 371; RICO conspiracy, in violation of 18 U.S.C. § 1962(d); conspiracy to commit visa fraud and visa fraud, in violation of 18 U.S.C. §§ 371 and 1546; conspiracy to commit health care fraud and health care fraud, in violation of 18 U.S.C. §§ 1347 and 1349; conspiracy to commit money laundering and money laundering, in violation of 18 U.S.C. §§ 1956 and 1957; a tax fraud conspiracy and a tax wire fraud scheme, in violation of 18 U.S.C. §§ 371 and 1343; and conspiracy to distribute an adulterated and misbranded dental device in interstate commerce, in violation of 18 U.S.C. § 371.

At present, seven defendants are scheduled to proceed to trial: Bhaskar, Arun and Niranjan Savani; Aleksandra Radomiak; Sunil Phillip, Bharatkumar Parsana; and Hitesh Goyani.

III. THE SPILLAGE

This filing addresses a post-indictment inadvertent release of documents to the trial team, which documents had been preliminarily screened for privilege, but not yet fully reviewed for privilege. In June 2019, a privilege review protocol was put in place. Under that protocol, documents that might contain attorney-client privileged or work product information were subject to an algorithm that searched for certain key words including (1) the names and email addresses of criminal defense attorneys and their staff known to have provided legal counsel to the Savani

Group, and (2) the names and email addresses of other attorneys and their staff known or reported to have provided legal counsel to the Savani Group. Only documents that passed the algorithm, that is, documents that did not contain any of these names or addresses, were put into the database that was accessible to the trial team. Documents that failed the algorithm were supposed to be provided to the trial team only after being reviewed and approved by an Assistant United States Attorney (“AUSA”) on the filter team.

Once the indictment was returned in January 2023, at the same time that the filter review was taking place, all of the incoming documents were provided unfiltered to defense counsel, to avoid the possibility that exculpatory material might be unintentionally withheld from the defense. Because the lead defendants were operating under a joint defense agreement, a decision was made to give all defense counsel all of the unfiltered documents, a plan to which defense counsel voiced no objection. This process resulted in two parallel streams of information: an unfiltered set of documents was provided in discovery to all defense counsel, and a filtered set of documents was to be put in the Relativity database to which the trial team had access.

The total spillage, which took place a little more than a year after the indictment was returned, that is, on or about February 6, 2024, was of approximately 54,082 documents. Of those 54,082 documents, log files of Relativity show that 51,700 were not opened by anyone. Accordingly, those 51,700 documents can be disregarded. This leaves 2,382 documents that were opened by someone working for the government after being inadvertently placed in the Relativity database that was accessible to the trial team.² The spillage occurred when an employee of the IT department of the United States Attorney’s Office (“USAO”) misunderstood directions given

² The history is taken from the log files of Relativity. All activity in Relativity is done remotely as the data is stored at the Department of Justice’s litigation support center in Columbia, SC. The logs are kept there as well.

about sending unfiltered documents to the defense, and believed he should also place the documents in the Relativity database that was accessible to the trial team. Because of this misunderstanding, he placed the 54,082 documents in the Relativity database to which the trial team had access. These 54,082 documents, along with others, were produced to the defense in discovery under cover of a discovery letter dated March 1, 2024. See Exhibit B, attached.

The government did not discover the spillage until approximately one year and four months later, on or about June 11, 2025, when a member of the trial team (who is no longer on the case and no longer employed by the office) alerted the IT department of the USAO that possibly privileged documents appeared to be in the database to which the trial team had access. That same day, the 54,082 spilled documents were removed from the trial team's data base access, so that no member of the trial team could access them, and they have remained locked down ever since.

All of the 54,082 electronic documents are loaded in the Relativity database program. Relativity is a database that can manage large numbers of electronic documents. Log files of Relativity make a record of whether, and for how long, documents were opened in Relativity. A review of the Relativity database shows that of the 54,082 spilled documents, persons working for the government, including current and past members of the trial team and one consultant, opened just 2,382 of the 54,082 documents before those documents were locked down on June 11, 2025. Of the 2,382 documents that were opened by current or former members of the trial team, only 690 were opened by current members of the trial team. Of the 690 opened documents, a privilege review shows that current members of the trial team opened a total of only 16 possibly privileged/work product documents. The Relativity Log files show that the 16 privileged/work product documents were opened by current members of the trial team for time periods ranging

from one second to 25 minutes.³ Indeed, these Relativity Log files reveal that many documents were quickly scanned, as they were not opened long enough for anyone to have absorbed their contents. Specifically, the length of screen time each of these documents was exposed to a member of the prosecution team is as follows:

Document 1	15 seconds (to agent)
Document 2	1 second (to AUSA)
Document 3	2 seconds (to AUSA)
Document 4	55 seconds (to agent)
Document 5	2 seconds (to agent)
Document 6	1 second (to agent)
Document 7	1 second (to agent)
Document 8	1 second (to agent)
Document 9	12 seconds (to agent)
Document 10	52 seconds (to agent)
Document 11	35 seconds (to agent)
Document 12	25 seconds (to forensic accountant)
Document 13	1 minute and 52 seconds (to USAO paralegal)
Document 14	15 seconds (to USAO paralegal)
Document 15	2 minutes and 54 seconds (to former AUSA) 17 seconds (to agent)
Document 16	25 minutes (to agent)

³ There is no way to know if the users looked at the document the entire time it was opened. Relativity tracks what the computer is doing, not what the computer user is doing. If someone walked into the office of the trial team member, or if that trial team member answered a telephone call, or was otherwise distracted during the period when the document was open, Relativity cannot ascertain that information.

Those 16 privileged documents have been provided to the Court and the defense in a sealed binder, marked Sealed Exhibit A. Attached to Sealed Exhibit A is the filter review attorneys' explanation of why we believe these documents, while possibly privileged or work product, are not relevant to any issue in this criminal case, and that their inadvertent disclosure results in no prejudice to the defendants. It is also noteworthy that none of the 16 possibly privileged/work product documents concern any of the defendants' criminal defense lawyers.

In addition, as mentioned above, Exhibit A to this filing is a list of the bates-stamp numbers of all of the 2,382 documents that were inadvertently released to the trial team and opened by anyone associated with the government. We attach this list of bates numbers in order to direct counsel to each spilled document that was opened by anyone associated with the government, should the defense wish to raise the status of any of these documents, even though the defense received those documents on March 1, 2024, a year and five months ago (See Exhibit B).

Upon a review, the filter review attorneys have determined that while 16 of the 690 documents opened by current members of the trial team are privileged/work product, and 60 of the 644 documents opened by past members of the trial team are privileged/work product, and 44 of the 1016 documents opened by the consultant described below are privileged/work product, none of these documents are relevant to the criminal case. For ease of reference, we include a chart of the spilled and opened documents below.

Status	Documents Viewed	Privileged/WP documents
Current trial team	690	16
Former trial team	644	60
DOJ consultant	1016	44
IT	32	18
Total	2382	138

In addition to the 16 privileged documents opened by current members of the trial team, and the 78 privileged documents opened by past members of the trial team and other government

personnel, approximately 1,061 documents from the set of 2,382 opened documents were opened by a consultant who works as a contractor for the Department of Justice’s Money Laundering and Asset Recovery Section (the “DOJ consultant”). Of those, 44 documents were determined by the filter review attorneys to be privileged/work product. The DOJ consultant is a Certified Public Accountant and Certified Fraud Examiner who has worked for DOJ in this capacity since 2019. He is not anticipated to be a witness at trial.

Although the DOJ consultant will not testify, he has assisted the trial team in two primary ways: (i) in explaining the financial crime network charged in the indictment; and (ii) in reviewing real and personal property records and financial transactions related to real and personal property purchases to assess potential forfeiture.

Based upon information provided to him by case agents, the DOJ consultant followed the money flow to the Savani Group-controlled dental practices from Managed Care Organizations (“MCOs”) responsible for Medicaid payments. This tracing nearly exclusively required review of billing information and financial documents, though he would also review the Secretary of State documents concerning ownership of entities receiving MCO funds, contracting documents, tax documents, and loan documents related to the Savani Group entities.

In addition, the DOJ consultant assisted the prosecution team to identify and determine the ownership status of assets – real and personal property – connected to the Savani Group Enterprise and the funds used to purchase those assets. It too required the DOJ consultant to review banking statements, along with deeds, leases, financing documents, contracts, and other documents related to ownership. Finally, at the direction of the prosecution team, the DOJ consultant obtained and reviewed information maintained in the prosecution team’s Relativity database to identify funds used to purchase the real or personal property.

A privilege review of the 1,016 documents opened by the DOJ consultant shows that 44 documents were potentially privileged/work product. These documents appear to the filter review attorneys to be similar in nature to the 16 privileged documents contained in Sealed Exhibit A, that is, arguably privileged but irrelevant. It also appears that no privileged documents affected nor informed the DOJ consultant's assessments of the evidence or communications to the trial team.

THE LAW

While the government regrets the human error that led to the document spillage and the consequent opening of the 16 privileged documents by current members of the trial team, we also wish to stress two things. *First*, the 16 privileged documents that were opened by current members of the trial team were opened after the indictment was returned and so could not possibly have had any bearing on the charges brought. In fact, those 16 privileged documents appear to the filter review attorneys to be irrelevant to this criminal case. Should the defense disagree, they can review the same binder of 16 sealed documents that we are providing to the Court and take whatever action they deem appropriate. Further, the same is true of the 644 documents that were opened by former members of the trial team who have since left the government – the 60 documents that were found by the filter review attorneys to be either potentially privileged or work product are nonetheless irrelevant to the criminal case. And the same appears true of the 1,016 documents opened by the DOJ consultant; the 44 documents that were found by the filter team to be potentially privileged or work product are nonetheless irrelevant to the criminal case. Again, should the defense disagree, they can review the list we have provided of the bates numbers of the 2,382 total spilled documents, and bring any claims to the Court's attention. *Second*, since June 2019, a filter team has been in place. The privilege review system was appropriate; nonetheless, the human error that led to the document spillage, while regrettable, was inadvertent and in no way the result of a lack of attention to the filter review process.

In support of our conclusions, we provide the following outline of the law in this area. Crucially, in order to obtain relief, the defense bears the burden of showing intentional conduct and prejudice. Here, there is neither. We submit that the defense cannot show any prejudice due to the subject matter of the documents and the short time that they were opened, which was not enough time in most cases to even read them. While the government's actions in executing the filter protocol were imperfect, there was no intentional invasion of privilege in opening the documents and no prejudice accruing to the defendants.

A. The Law of Outrageous Government Misconduct

As the Third Circuit has noted about this claim, “the doctrine of outrageous government misconduct, although often invoked by defendants, is rarely applied by courts.” *United States v. Voigt*, 89 F.3d 1050, 1065 (3d Cir. 1996).⁴ See also *United States v. Fattah*, 858 F.3d 801, 812 (3d Cir. 2017). Moreover, the Third Circuit has noted that it is only applicable in rare, extreme circumstances.

Although the requirement of outrageousness has been stated in several different ways by various courts, the thrust of each of these formulations is that the challenged conduct must be shocking, outrageous, and clearly intolerable.... The cases make it clear that this is an extraordinary defense reserved for only the most egregious circumstances. It is not to be invoked each time the government acts deceptively or participates in a crime that it is investigating. Nor is it intended merely as a device to circumvent the predisposition test in the entrapment defense.

United States v. Nolan-Cooper, 155 F.3d 221, 230–31 (3d Cir. 1998), quoting *United States v. Mosley*, 965 F.2d 906, 910 (10th Cir.1992).

As the *Mosley* court put it, “Outrageousness must be determined by reference to the universal sense of justice.” *Id.*

⁴ Or, as the First Circuit put it more colorfully, “The banner of outrageous conduct is often raised but seldom saluted.” *United States v. Santana*, 6 F.3d 1, 4 (1st Cir. 1993), quoted in *Voigt*, 89 F.3d at 1065.

The law appears to recognize at least two “flavors” of such conduct. The first arises when the government is involved in the underlying criminal conduct. *United States v. Russell*, 411 U.S. 423 (1973) (government delivered precursor chemical to the defendant, who used it to manufacture methamphetamine); *Hampton v. United States*, 425 U.S. 484 (1976) (government delivered heroin to defendant who then sold it); *United States v. Twigg*, 588 F.2d 373 (3d Cir. 1978) (government set in motion the idea to set up a meth lab and was actively involved in supplying necessary materials); *United States v. Nolan-Cooper*, 155 F.3d 221 (3d Cir. 1998) (investigating agent had sexual relationship with target of tax investigation).⁵ These defendants cannot assert that the government was deeply involved in getting them to commit the fraudulent conduct charged in the indictment, nor can they claim that the government’s actions were “entwined with the events charged.” *Nolan-Cooper*, 155 F.3d at 232.

The court in *Nolan-Cooper* also observed, “Indeed, since *Hampton*, the only opinion upholding the application of the defense is the opinion for a divided panel of this court in *United States v. Twigg*, 588 F.2d 373 (3d Cir. 1978).” *Id.* at 230. The Third Circuit wrote the following about *Twigg* most recently: “Since *Twigg* was decided this Court has repeatedly distinguished and even questioned, its holding.” *United States v. Fattah*, 801 F.3d 813 (footnote and citation omitted).

This first flavor of “outrageous government conduct” case raises a fundamental philosophical question. As the Third Circuit noted in *Fattah*, when writing about *Twigg*: “[i]n short, the Government ‘created the crime for the sole purpose of obtaining a conviction.’ *United States v. Dennis*, 826 F.3d 683, 695 (3d Cir. 2016) (citation omitted).” *United States v. Fattah*, 858

⁵ In *Nolan-Cooper*, the court noted that in this flavor of outrageous government conduct claim, the actions must take place “during or close to the period covered by the indictment,” and they must be “entwined with the events charged.” *Id.* at 232.

F.3d at 813. Where the government “creates the crime,” the idea of dismissal has some logical force, because there is a philosophical question whether a crime has even been committed. However, dismissal loses its logical force as a potential remedy when the government uses some technique, which a defendant or a court finds offensive, to investigate a real crime.⁶

A second “flavor” is closer to this case and involves government “intentional invasion of the defense camp.” The term “intentional invasion of the defense camp” in this context has a very narrow meaning. Courts have only considered it when the government inserts a witness into meetings between a defendant and his attorney. The facts of *United States v. Levy*, 577 F.2d 200 (3d Cir. 1978), demonstrate what the Court means when it speaks of an “intentional invasion.” In that case, the government charged Verna and Visceglia with drug trafficking offenses. The same attorney represented both of them. When they were charged, Visceglia was a government informant and remained one throughout the proceedings. He met with Verna and their joint attorney throughout the case to discuss the defense, even though the attorney and Verna were unaware of his informant status. It is this level of “intentional invasion” that is required.

United States v. Ofshe, 817 F.2d 1508, 1515 (11th Cir. 1987), demonstrates how high the defense burden is. In *Ofshe*, the government obtained the cooperation of an attorney and had him record discussions with his client. The conversations were about two topics – an ongoing money laundering/drug scheme and the case in which the attorney represented the defendant. The

⁶ It is worth remembering that all of the “outrageous government conduct” cases go back to *Rochin v. California*, 342 U.S. 165 (1952), in which police officers broke into the defendant’s residence. When the defendant swallowed some capsules, the police seized him, took him to a hospital, where they pumped his stomach. The prosecution offered the capsules that he vomited into evidence. Even though the Court found that the police conduct “shocks the conscience” 342 U.S. at 209, the remedy was exclusion of the evidence, not dismissal of the prosecution. Even where the state coerces a confession from a prisoner by creating fear of serious bodily injury or death, the remedy is suppression of the confession and its fruits, not dismissal of the charges. E.g. *Payne v. Arkansas*, 356 U.S. 560 (1958).

discussions about criminal activity other than that for which the attorney was representing him meant that there was no issue with respect to those conversations. *United States v. Voigt*, 89 F.3d 1050, 1066 (3d Cir. 1996) (citing *Ofshe* with approval). The fact that the information about the pending case only related to public information and had not been passed to the prosecutors meant that there was no prejudice to the defense. The court found that the intrusion “was designed to obtain information regarding Ofshe’s subsequent criminal conduct and not used to discover defense strategy.” Id. at 1516 (emphasis supplied.)

In *United States v. Mitan*, 499 Fed. Appx. 187 (3d Cir. 2012) (not precedential), the government listened to the defendant’s prison calls, while he was representing himself. Even though the Court held that the government erred in doing so, it found that dismissal was not appropriate. The Court explained just how high the bar was to obtain such relief in the following passage:

Assuming that the presumption of prejudice approach adopted in *Levy* remains viable, Mitan cannot avail himself of it because he cannot show that the government intentionally invaded any attorney client relationship. On the contrary, while the government made mistakes, it undertook measures to ensure that it did not invade the defense camp. If any communication concerning legal strategy was intercepted, it was unintentional – certainly far from the level of intentional invasion present in *Levy*.

Mitan, 499 Fed. Appx. at 193 (emphasis supplied; footnote omitted).

United States v. Levy, 577 F.2d 200, is an old precedent in this circuit that holds that where the defendant can show an invasion of the defense camp, the release of legal strategy, and intentional government conduct, there is no requirement of prejudice. However, the Supreme Court has undoubtedly overruled *Levy*. *Levy* predates the Supreme Court’s decision in *United States v. Morrison*, 449 U.S. 361, and *Levy* was cited as precedent in the Third Circuit’s opinion in *Morrison*, 602 F.2d 529, 533 (3d Cir 1979), *rev’d*, 449 U.S. 361, for the proposition that prejudice was not required. (“Because an attempt to assess the prejudice to the defendant would have been

speculative at best, we held that the intrusion and mere disclosure, without more, was sufficient to make out a sixth amendment violation. In light of the fact that no other relief would remedy the violation and, considering the extent and seriousness of the improper conduct of the government, we found the only appropriate relief for the violation to be dismissal of the indictment.”) The Supreme Court’s opinion in *Morrison* rejected that reasoning and held that there should be no dismissal of charges without a showing of prejudice to the defense. The Third Circuit has recognized, but not yet decided, that *Levy* may have been overruled. *United States v. Mitan*, 499 Fed. Appx. at 192 n. 6 (“We need not address the question of whether *Morrison* precludes the presumption of prejudice approach adopted in *Levy* because *Mitan* cannot show the factual predicate for the presumption: an intentional invasion of the defense camp.”).

The facts as outlined here show a simple human error. It does not come close to intentionally sending a witness to attend a confidential meeting between an attorney and client as in *Levy*, or recruiting an attorney to provide information about his client, as in *Ofshe* and *Voigt*. Indeed, they do not come close to the conduct of the government in *Mitan*, intentionally listening to the calls of a defendant who was representing himself. The Third Circuit held in *Mitan* that even though the government intentionally listened to the defendant’s prison calls while he was representing himself, the government had not intentionally invaded the attorney client privilege. Here, the members of the trial team did not realize that they were opening privileged documents. The conduct of the members of the trial team does not approach that of the agents in *Levy*, *Voigt*, *Ofshe*, or *Mitan*. None of those cases resulted in dismissal. The conduct here may have been regrettable, but it does not come close to meeting the threshold requirement that it be “shocking, outrageous, and clearly intolerable” *Nolan-Cooper*, 155 F.3d 230-31. See also *United States v. Anand*, 2022 WL 3357484 (E.D. Pa. Aug. 15, 2022) (not precedential) (trial team’s viewing of documents containing privileged communications between a defendant and one of his lawyers,

due to errors in conducting the filter review process, did not rise to a Sixth Amendment violation; motion to dismiss indictment or dismiss trial team denied).

B. Suppression

As an alternative to dismissal of the Indictment, a defendant might ask the Court to suppress all evidence obtained after the first date on which a member of the trial team looked at one of the 16 documents. That remedy would also be inappropriate for the reasons that follow.

A breach of a privilege without constitutional implications may warrant suppressing the privileged statement, but not any fruits of the privileged information. *Nickel v. Hannigan*, 97 F.3d 403, 409 (10th Cir. 1996) (breach of attorney client privilege does not require suppression of defendant's statement "directly traceable" to the violation of the privilege); *United States v. Warshak*, 631 F.3d 266, 294 (6th Cir. 2010); *accord, United States v. Squillacote*, 2212 F.3d 542, 560 (4th Cir. 2000) (therapist patient privilege); *United States v. Marashi*, 913 F.2d 724, 731, n.11 (9th Cir. 1990) (marital privilege); *United States v. Lefkowitz*, 618 F.2d 1313, 1318 n.8 (9th Cir. 1980) (marital privilege).⁷ The breaches of the privilege in these reported cases were far more serious than what is involved here. In *Nickel v. Hannigan*, the defendant confessed to his attorney, who disclosed this fact to the police. The defendant sought to suppress his confession to the police because the police had obtained it only after the lawyer told the police about the defendant's confession to him. He asked for suppression because the confession was "directly traceable" to the breach of the attorney client privilege. *Id.*, 97 F.3d at 409. The court rejected the idea that the fruits of a breach of the privilege are suppressible.

⁷ In *Mohawk Indus., Inc. v. Carpenter*, 558 U.S. 100, 101 (2009), the Supreme Court did suggest that suppression of the fruits might be the remedy, but the Court was considering whether the appellant could take an interlocutory appeal and was not deciding this issue.

In *United States v. Warshak*, 631 F.3d 266, the defendant claimed he was entitled to a *Kastigar*-like⁸ evidentiary hearing at which the government was required to prove that the agents did not obtain any evidence from their having access to approximately 60,000 e-mail communications to and from his attorneys. *Id.* at 292-293. The court rejected this argument, holding first that a *Kastigar* analysis could only be required when there was compelled testimony. It was not required when there was no compulsion. The court further held that evidence obtained from a breach of a privilege is not subject to a “fruit of the poisonous tree” analysis. The court declined to apply the doctrine beyond the realm of constitutional violations. *Id.* at 294-95.

Here, we are dealing with brief viewings of privileged but irrelevant documents. Suppression of those documents might be appropriate, but the suppression of anything found because of the reading of the documents is not. The concept of suppressing the fruits of a constitutional violation does not carry over to non-constitutional violations of privileges. Certainly, any such remedy that might be requested by the defendants, of either dismissal of the charges, or suppression of everything found after the reading of the documents, whether connected to the

⁸ *Kastigar v. United States*, 406 U.S. 441 (1972).

reading or not, would not be appropriate under the law.

Respectfully submitted,

DAVID METCALF
United States Attorney

/s/ David E. Troyer _____

DAVID E. TROYER
Assistant United States Attorney
Chief, Narcotics & Organized Crime

/s/ Mary E. Crawley _____

MARY E. CRAWLEY
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the Government's Notice upon the following by filing it with the Court's Electronic Case Filing System:

Ronald W. Chapman II
CHAPMAN LAW GROUP
1441 W. LONG LAKE RD.
STE. 310
TROY, MI 48098
rwchapman@chapmanlawgroup.com

Aaron M. Katz
AARON KATZ LAW LLC
399 Boylston Street, 6th Floor
Boston, MA 02116
akatz@aaronkatzlaw.com

John J. McMahon, Jr.
LAW OFFICE OF JACK MCMAHON
139 NORTH CROSKEY ST
PHILADELPHIA, PA 19103
mcmahonlaw@hotmail.com

Patrick J. Egan
FOX ROTHSCHILD LLP
2000 MARKET ST 10TH FL
PHILADELPHIA, PA 19107
pegan@foxrothschild.com

Todd Henry
THE HENRY LAW FIRM
1500 WALNUT STREET SUITE 1060
PHILADELPHIA, PA 19102
dlombardo@thehenryfirm.biz

Leigh Michael Skipper
Duane Morris LLP
30 South 17th Street 19103
Philadelphia, PA 19103
lmskipper@duanemorris.com

J. Thomas "Tom" Clarkson
Griffin Durham Tanner & Clarkson
75 14th Street, NE
Suite 2130
Atlanta, GA
tclarkson@griifindurham.com

Lawrence J. Bozzelli
THE BOZZELLI LAW FIRM
1315 Walnut Street, Suite 1605
PHILADELPHIA, PA 19107
lbozz@hotmail.com

Michael Brendan Mccrossen
Federal Community Defender Office Trial Unit
601 Walnut Street Ste 540
Philadelphia, PA 19106
michael_mccrossen@fd.org

David N. Fautsch
Fautsch Tursi LLP
305 42nd Street
Des Moines, IA 50312
david@fautschtursi.com

/s/ Mary E. Crawley
MARY E. CRAWLEY
Assistant United States Attorney

September 10, 2025

EXHIBIT A

Exhibit A

Page 1

#	Bates Number
1	USA_DISC_SW-0002736491
2	USA_DISC_SW-0002736499
3	USA_DISC_SW-0002736614
4	USA_DISC_SW-0002736629
5	USA_DISC_SW-0002736636
6	USA_DISC_SW-0002736662
7	USA_DISC_SW-0002737106
8	USA_DISC_SW-0002737291
9	USA_DISC_SW-0002738549
10	USA_DISC_SW-0002739129
11	USA_DISC_SW-0002739905
12	USA_DISC_SW-0002740461
13	USA_DISC_SW-0002741555
14	USA_DISC_SW-0002746767
15	USA_DISC_SW-0002755186
16	USA_DISC_SW-0002757308
17	USA_DISC_SW-0002758515
18	USA_DISC_SW-0002759444
19	USA_DISC_SW-0002761909
20	USA_DISC_SW-0002763416
21	USA_DISC_SW-0002767720
22	USA_DISC_SW-0002769490
23	USA_DISC_SW-0002769714
24	USA_DISC_SW-0002769715
25	USA_DISC_SW-0002769764
26	USA_DISC_SW-0002769995
27	USA_DISC_SW-0002770189
28	USA_DISC_SW-0002770845
29	USA_DISC_SW-0002770980
30	USA_DISC_SW-0002771101
31	USA_DISC_SW-0002771248
32	USA_DISC_SW-0002771439
33	USA_DISC_SW-0002771621
34	USA_DISC_SW-0002771677
35	USA_DISC_SW-0002771678
36	USA_DISC_SW-0002771679
37	USA_DISC_SW-0002771680
38	USA_DISC_SW-0002771882
39	USA_DISC_SW-0002771969
40	USA_DISC_SW-0002772222

#	Bates Number
41	USA_DISC_SW-0002772223
42	USA_DISC_SW-0002772445
43	USA_DISC_SW-0002773357
44	USA_DISC_SW-0002773382
45	USA_DISC_SW-0002773413
46	USA_DISC_SW-0002774248
47	USA_DISC_SW-0002774260
48	USA_DISC_SW-0002774270
49	USA_DISC_SW-0002774310
50	USA_DISC_SW-0002774460
51	USA_DISC_SW-0002774461
52	USA_DISC_SW-0002774823
53	USA_DISC_SW-0002775760
54	USA_DISC_SW-0002775835
55	USA_DISC_SW-0002775837
56	USA_DISC_SW-0002777336
57	USA_DISC_SW-0002777525
58	USA_DISC_SW-0002777610
59	USA_DISC_SW-0002777630
60	USA_DISC_SW-0002777710
61	USA_DISC_SW-0002777856
62	USA_DISC_SW-0002777860
63	USA_DISC_SW-0002778116
64	USA_DISC_SW-0002778269
65	USA_DISC_SW-0002778273
66	USA_DISC_SW-0002778363
67	USA_DISC_SW-0002778529
68	USA_DISC_SW-0002778631
69	USA_DISC_SW-0002779870
70	USA_DISC_SW-0002780316
71	USA_DISC_SW-0002780319
72	USA_DISC_SW-0002780320
73	USA_DISC_SW-0002780333
74	USA_DISC_SW-0002781486
75	USA_DISC_SW-0002781550
76	USA_DISC_SW-0002781553
77	USA_DISC_SW-0002781567
78	USA_DISC_SW-0002781593
79	USA_DISC_SW-0002781615
80	USA_DISC_SW-0002781619

Exhibit A

Page 2

#	Bates Number
81	USA_DISC_SW-0002781626
82	USA_DISC_SW-0002781638
83	USA_DISC_SW-0002781648
84	USA_DISC_SW-0002781665
85	USA_DISC_SW-0002782269
86	USA_DISC_SW-0002782330
87	USA_DISC_SW-0002782344
88	USA_DISC_SW-0002783930
89	USA_DISC_SW-0002783940
90	USA_DISC_SW-0002783981
91	USA_DISC_SW-0002784043
92	USA_DISC_SW-0002784048
93	USA_DISC_SW-0002784139
94	USA_DISC_SW-0002784264
95	USA_DISC_SW-0002784277
96	USA_DISC_SW-0002784325
97	USA_DISC_SW-0002784347
98	USA_DISC_SW-0002784367
99	USA_DISC_SW-0002785379
100	USA_DISC_SW-0002785380
101	USA_DISC_SW-0002785464
102	USA_DISC_SW-0002785467
103	USA_DISC_SW-0002785552
104	USA_DISC_SW-0002785595
105	USA_DISC_SW-0002785598
106	USA_DISC_SW-0002786018
107	USA_DISC_SW-0002786195
108	USA_DISC_SW-0002786206
109	USA_DISC_SW-0002786394
110	USA_DISC_SW-0002786484
111	USA_DISC_SW-0002786565
112	USA_DISC_SW-0002786583
113	USA_DISC_SW-0002787627
114	USA_DISC_SW-0002787758
115	USA_DISC_SW-0002789617
116	USA_DISC_SW-0002790416
117	USA_DISC_SW-0002790421
118	USA_DISC_SW-0002790526
119	USA_DISC_SW-0002790631
120	USA_DISC_SW-0002790642

#	Bates Number
121	USA_DISC_SW-0002790664
122	USA_DISC_SW-0002790695
123	USA_DISC_SW-0002790741
124	USA_DISC_SW-0002790822
125	USA_DISC_SW-0002790846
126	USA_DISC_SW-0002790933
127	USA_DISC_SW-0002790943
128	USA_DISC_SW-0002790964
129	USA_DISC_SW-0002790986
130	USA_DISC_SW-0002790996
131	USA_DISC_SW-0002790998
132	USA_DISC_SW-0002791001
133	USA_DISC_SW-0002791009
134	USA_DISC_SW-0002791020
135	USA_DISC_SW-0002791027
136	USA_DISC_SW-0002791057
137	USA_DISC_SW-0002791068
138	USA_DISC_SW-0002791072
139	USA_DISC_SW-0002791076
140	USA_DISC_SW-0002791106
141	USA_DISC_SW-0002791198
142	USA_DISC_SW-0002791249
143	USA_DISC_SW-0002791983
144	USA_DISC_SW-0002792848
145	USA_DISC_SW-0002793031
146	USA_DISC_SW-0002793078
147	USA_DISC_SW-0002793088
148	USA_DISC_SW-0002793233
149	USA_DISC_SW-0002793442
150	USA_DISC_SW-0002793443
151	USA_DISC_SW-0002793721
152	USA_DISC_SW-0002793783
153	USA_DISC_SW-0002793819
154	USA_DISC_SW-0002794124
155	USA_DISC_SW-0002794175
156	USA_DISC_SW-0002794767
157	USA_DISC_SW-0002794864
158	USA_DISC_SW-0002795105
159	USA_DISC_SW-0002795126
160	USA_DISC_SW-0002795165

Exhibit A

Page 3

#	Bates Number
161	USA_DISC_SW-0002795208
162	USA_DISC_SW-0002795308
163	USA_DISC_SW-0002795669
164	USA_DISC_SW-0002796130
165	USA_DISC_SW-0002796140
166	USA_DISC_SW-0002796486
167	USA_DISC_SW-0002796856
168	USA_DISC_SW-0002796911
169	USA_DISC_SW-0002797048
170	USA_DISC_SW-0002797080
171	USA_DISC_SW-0002797357
172	USA_DISC_SW-0002797461
173	USA_DISC_SW-0002797712
174	USA_DISC_SW-0002797743
175	USA_DISC_SW-0002797773
176	USA_DISC_SW-0002798309
177	USA_DISC_SW-0002798479
178	USA_DISC_SW-0002798504
179	USA_DISC_SW-0002798519
180	USA_DISC_SW-0002798579
181	USA_DISC_SW-0002799213
182	USA_DISC_SW-0002799345
183	USA_DISC_SW-0002799894
184	USA_DISC_SW-0002800052
185	USA_DISC_SW-0002800097
186	USA_DISC_SW-0002800343
187	USA_DISC_SW-0002800389
188	USA_DISC_SW-0002800399
189	USA_DISC_SW-0002800717
190	USA_DISC_SW-0002801196
191	USA_DISC_SW-0002801372
192	USA_DISC_SW-0002801382
193	USA_DISC_SW-0002801642
194	USA_DISC_SW-0002801903
195	USA_DISC_SW-0002802278
196	USA_DISC_SW-0002802854
197	USA_DISC_SW-0002803735
198	USA_DISC_SW-0002803854
199	USA_DISC_SW-0002804565
200	USA_DISC_SW-0002804566

#	Bates Number
201	USA_DISC_SW-0002804567
202	USA_DISC_SW-0002804682
203	USA_DISC_SW-0002804778
204	USA_DISC_SW-0002804793
205	USA_DISC_SW-0002805119
206	USA_DISC_SW-0002805131
207	USA_DISC_SW-0002805555
208	USA_DISC_SW-0002805938
209	USA_DISC_SW-0002806035
210	USA_DISC_SW-0002806690
211	USA_DISC_SW-0002806730
212	USA_DISC_SW-0002806740
213	USA_DISC_SW-0002806900
214	USA_DISC_SW-0002807493
215	USA_DISC_SW-0002807851
216	USA_DISC_SW-0002808206
217	USA_DISC_SW-0002808229
218	USA_DISC_SW-0002808239
219	USA_DISC_SW-0002808683
220	USA_DISC_SW-0002809128
221	USA_DISC_SW-0002810253
222	USA_DISC_SW-0002810254
223	USA_DISC_SW-0002810255
224	USA_DISC_SW-0002810406
225	USA_DISC_SW-0002810489
226	USA_DISC_SW-0002810530
227	USA_DISC_SW-0002810531
228	USA_DISC_SW-0002810544
229	USA_DISC_SW-0002810567
230	USA_DISC_SW-0002811264
231	USA_DISC_SW-0002812235
232	USA_DISC_SW-0002812713
233	USA_DISC_SW-0002813166
234	USA_DISC_SW-0002813438
235	USA_DISC_SW-0002813453
236	USA_DISC_SW-0002813617
237	USA_DISC_SW-0002814426
238	USA_DISC_SW-0002814429
239	USA_DISC_SW-0002814432
240	USA_DISC_SW-0002814556

Exhibit A

Page 4

#	Bates Number
241	USA_DISC_SW-0002814572
242	USA_DISC_SW-0002814611
243	USA_DISC_SW-0002814648
244	USA_DISC_SW-0002815479
245	USA_DISC_SW-0002815493
246	USA_DISC_SW-0002815508
247	USA_DISC_SW-0002815534
248	USA_DISC_SW-0002815702
249	USA_DISC_SW-0002815736
250	USA_DISC_SW-0002815771
251	USA_DISC_SW-0002815807
252	USA_DISC_SW-0002815809
253	USA_DISC_SW-0002815813
254	USA_DISC_SW-0002815850
255	USA_DISC_SW-0002815889
256	USA_DISC_SW-0002815931
257	USA_DISC_SW-0002815999
258	USA_DISC_SW-0002816238
259	USA_DISC_SW-0002816317
260	USA_DISC_SW-0002816333
261	USA_DISC_SW-0002816495
262	USA_DISC_SW-0002816531
263	USA_DISC_SW-0002816802
264	USA_DISC_SW-0002816825
265	USA_DISC_SW-0002816860
266	USA_DISC_SW-0002817024
267	USA_DISC_SW-0002817102
268	USA_DISC_SW-0002817105
269	USA_DISC_SW-0002817107
270	USA_DISC_SW-0002818514
271	USA_DISC_SW-0002818740
272	USA_DISC_SW-0002818822
273	USA_DISC_SW-0002818883
274	USA_DISC_SW-0002818948
275	USA_DISC_SW-0002818949
276	USA_DISC_SW-0002818962
277	USA_DISC_SW-0002818967
278	USA_DISC_SW-0002818977
279	USA_DISC_SW-0002818993
280	USA_DISC_SW-0002818995

#	Bates Number
281	USA_DISC_SW-0002818996
282	USA_DISC_SW-0002819048
283	USA_DISC_SW-0002819372
284	USA_DISC_SW-0002819663
285	USA_DISC_SW-0002819667
286	USA_DISC_SW-0002819676
287	USA_DISC_SW-0002819678
288	USA_DISC_SW-0002819681
289	USA_DISC_SW-0002819683
290	USA_DISC_SW-0002820041
291	USA_DISC_SW-0002820425
292	USA_DISC_SW-0002820447
293	USA_DISC_SW-0002820463
294	USA_DISC_SW-0002820466
295	USA_DISC_SW-0002820472
296	USA_DISC_SW-0002820474
297	USA_DISC_SW-0002820718
298	USA_DISC_SW-0002821024
299	USA_DISC_SW-0002821033
300	USA_DISC_SW-0002821038
301	USA_DISC_SW-0002821042
302	USA_DISC_SW-0002821053
303	USA_DISC_SW-0002821063
304	USA_DISC_SW-0002821095
305	USA_DISC_SW-0002821100
306	USA_DISC_SW-0002821103
307	USA_DISC_SW-0002821109
308	USA_DISC_SW-0002821116
309	USA_DISC_SW-0002821178
310	USA_DISC_SW-0002821180
311	USA_DISC_SW-0002821537
312	USA_DISC_SW-0002821594
313	USA_DISC_SW-0002821717
314	USA_DISC_SW-0002821719
315	USA_DISC_SW-0002821727
316	USA_DISC_SW-0002821728
317	USA_DISC_SW-0002821730
318	USA_DISC_SW-0002821732
319	USA_DISC_SW-0002821737
320	USA_DISC_SW-0002821792

Exhibit A

Page 5

#	Bates Number
321	USA_DISC_SW-0002821799
322	USA_DISC_SW-0002821814
323	USA_DISC_SW-0002821826
324	USA_DISC_SW-0002821879
325	USA_DISC_SW-0002822249
326	USA_DISC_SW-0002822344
327	USA_DISC_SW-0002822353
328	USA_DISC_SW-0002822368
329	USA_DISC_SW-0002822371
330	USA_DISC_SW-0002822373
331	USA_DISC_SW-0002822378
332	USA_DISC_SW-0002822435
333	USA_DISC_SW-0002822532
334	USA_DISC_SW-0002822862
335	USA_DISC_SW-0002822876
336	USA_DISC_SW-0002822891
337	USA_DISC_SW-0002822898
338	USA_DISC_SW-0002823385
339	USA_DISC_SW-0002823409
340	USA_DISC_SW-0002823521
341	USA_DISC_SW-0002823572
342	USA_DISC_SW-0002823877
343	USA_DISC_SW-0002823977
344	USA_DISC_SW-0002824045
345	USA_DISC_SW-0002824236
346	USA_DISC_SW-0002824242
347	USA_DISC_SW-0002824347
348	USA_DISC_SW-0002824588
349	USA_DISC_SW-0002824656
350	USA_DISC_SW-0002824657
351	USA_DISC_SW-0002824671
352	USA_DISC_SW-0002824724
353	USA_DISC_SW-0002824854
354	USA_DISC_SW-0002824868
355	USA_DISC_SW-0002825169
356	USA_DISC_SW-0002825237
357	USA_DISC_SW-0002825323
358	USA_DISC_SW-0002825699
359	USA_DISC_SW-0002825702
360	USA_DISC_SW-0002825741

#	Bates Number
361	USA_DISC_SW-0002826005
362	USA_DISC_SW-0002826006
363	USA_DISC_SW-0002826449
364	USA_DISC_SW-0002827801
365	USA_DISC_SW-0002827918
366	USA_DISC_SW-0002827951
367	USA_DISC_SW-0002827966
368	USA_DISC_SW-0002829143
369	USA_DISC_SW-0002829491
370	USA_DISC_SW-0002829607
371	USA_DISC_SW-0002829699
372	USA_DISC_SW-0002829762
373	USA_DISC_SW-0002829905
374	USA_DISC_SW-0002829915
375	USA_DISC_SW-0002830242
376	USA_DISC_SW-0002831198
377	USA_DISC_SW-0002831268
378	USA_DISC_SW-0002831416
379	USA_DISC_SW-0002831422
380	USA_DISC_SW-0002832031
381	USA_DISC_SW-0002832069
382	USA_DISC_SW-0002832073
383	USA_DISC_SW-0002832077
384	USA_DISC_SW-0002832147
385	USA_DISC_SW-0002832375
386	USA_DISC_SW-0002832550
387	USA_DISC_SW-0002832552
388	USA_DISC_SW-0002832558
389	USA_DISC_SW-0002832568
390	USA_DISC_SW-0002832694
391	USA_DISC_SW-0002832841
392	USA_DISC_SW-0002832894
393	USA_DISC_SW-0002833633
394	USA_DISC_SW-0002833662
395	USA_DISC_SW-0002833675
396	USA_DISC_SW-0002833845
397	USA_DISC_SW-0002834246
398	USA_DISC_SW-0002834287
399	USA_DISC_SW-0002834294
400	USA_DISC_SW-0002834296

Exhibit A

Page 6

#	Bates Number
401	USA_DISC_SW-0002834473
402	USA_DISC_SW-0002835168
403	USA_DISC_SW-0002835235
404	USA_DISC_SW-0002835253
405	USA_DISC_SW-0002835350
406	USA_DISC_SW-0002836136
407	USA_DISC_SW-0002836479
408	USA_DISC_SW-0002836751
409	USA_DISC_SW-0002836774
410	USA_DISC_SW-0002838310
411	USA_DISC_SW-0002838398
412	USA_DISC_SW-0002838482
413	USA_DISC_SW-0002838493
414	USA_DISC_SW-0002838503
415	USA_DISC_SW-0002838506
416	USA_DISC_SW-0002839482
417	USA_DISC_SW-0002839559
418	USA_DISC_SW-0002839562
419	USA_DISC_SW-0002839601
420	USA_DISC_SW-0002839623
421	USA_DISC_SW-0002839626
422	USA_DISC_SW-0002839651
423	USA_DISC_SW-0002839763
424	USA_DISC_SW-0002839861
425	USA_DISC_SW-0002840046
426	USA_DISC_SW-0002840130
427	USA_DISC_SW-0002840140
428	USA_DISC_SW-0002840761
429	USA_DISC_SW-0002840771
430	USA_DISC_SW-0002840791
431	USA_DISC_SW-0002840801
432	USA_DISC_SW-0002840811
433	USA_DISC_SW-0002840821
434	USA_DISC_SW-0002840831
435	USA_DISC_SW-0002840841
436	USA_DISC_SW-0002840851
437	USA_DISC_SW-0002840861
438	USA_DISC_SW-0002840871
439	USA_DISC_SW-0002840881
440	USA_DISC_SW-0002840891

#	Bates Number
441	USA_DISC_SW-0002840901
442	USA_DISC_SW-0002840911
443	USA_DISC_SW-0002840921
444	USA_DISC_SW-0002840931
445	USA_DISC_SW-0002841200
446	USA_DISC_SW-0002841241
447	USA_DISC_SW-0002841243
448	USA_DISC_SW-0002841252
449	USA_DISC_SW-0002841318
450	USA_DISC_SW-0002841328
451	USA_DISC_SW-0002841338
452	USA_DISC_SW-0002841348
453	USA_DISC_SW-0002841358
454	USA_DISC_SW-0002841368
455	USA_DISC_SW-0002841378
456	USA_DISC_SW-0002841388
457	USA_DISC_SW-0002841398
458	USA_DISC_SW-0002841408
459	USA_DISC_SW-0002841418
460	USA_DISC_SW-0002841428
461	USA_DISC_SW-0002841438
462	USA_DISC_SW-0002841448
463	USA_DISC_SW-0002841488
464	USA_DISC_SW-0002841498
465	USA_DISC_SW-0002841753
466	USA_DISC_SW-0002841784
467	USA_DISC_SW-0002841830
468	USA_DISC_SW-0002841858
469	USA_DISC_SW-0002841940
470	USA_DISC_SW-0002842198
471	USA_DISC_SW-0002842202
472	USA_DISC_SW-0002842441
473	USA_DISC_SW-0002842447
474	USA_DISC_SW-0002842866
475	USA_DISC_SW-0002843013
476	USA_DISC_SW-0002844071
477	USA_DISC_SW-0002844157
478	USA_DISC_SW-0002844188
479	USA_DISC_SW-0002844200
480	USA_DISC_SW-0002844209

Exhibit A

Page 7

#	Bates Number
481	USA_DISC_SW-0002844750
482	USA_DISC_SW-0002844785
483	USA_DISC_SW-0002844795
484	USA_DISC_SW-0002844815
485	USA_DISC_SW-0002844889
486	USA_DISC_SW-0002844899
487	USA_DISC_SW-0002844957
488	USA_DISC_SW-0002845053
489	USA_DISC_SW-0002845063
490	USA_DISC_SW-0002845073
491	USA_DISC_SW-0002845123
492	USA_DISC_SW-0002845143
493	USA_DISC_SW-0002845153
494	USA_DISC_SW-0002845210
495	USA_DISC_SW-0002845230
496	USA_DISC_SW-0002845256
497	USA_DISC_SW-0002845326
498	USA_DISC_SW-0002845501
499	USA_DISC_SW-0002846163
500	USA_DISC_SW-0002846171
501	USA_DISC_SW-0002847017
502	USA_DISC_SW-0002847018
503	USA_DISC_SW-0002847019
504	USA_DISC_SW-0002847632
505	USA_DISC_SW-0002847642
506	USA_DISC_SW-0002847662
507	USA_DISC_SW-0002847672
508	USA_DISC_SW-0002847692
509	USA_DISC_SW-0002847835
510	USA_DISC_SW-0002847845
511	USA_DISC_SW-0002847865
512	USA_DISC_SW-0002847875
513	USA_DISC_SW-0002847895
514	USA_DISC_SW-0002848269
515	USA_DISC_SW-0002848299
516	USA_DISC_SW-0002848309
517	USA_DISC_SW-0002848479
518	USA_DISC_SW-0002848508
519	USA_DISC_SW-0002848520
520	USA_DISC_SW-0002849067

#	Bates Number
521	USA_DISC_SW-0002849260
522	USA_DISC_SW-0002849270
523	USA_DISC_SW-0002849282
524	USA_DISC_SW-0002849519
525	USA_DISC_SW-0002849529
526	USA_DISC_SW-0002849577
527	USA_DISC_SW-0002849579
528	USA_DISC_SW-0002849672
529	USA_DISC_SW-0002849685
530	USA_DISC_SW-0002849707
531	USA_DISC_SW-0002853730
532	USA_DISC_SW-0002855032
533	USA_DISC_SW-0002855042
534	USA_DISC_SW-0002855049
535	USA_DISC_SW-0002855059
536	USA_DISC_SW-0002855061
537	USA_DISC_SW-0002855078
538	USA_DISC_SW-0002855088
539	USA_DISC_SW-0002855090
540	USA_DISC_SW-0002855226
541	USA_DISC_SW-0002855236
542	USA_DISC_SW-0002855246
543	USA_DISC_SW-0002855334
544	USA_DISC_SW-0002855344
545	USA_DISC_SW-0002855397
546	USA_DISC_SW-0002855407
547	USA_DISC_SW-0002855417
548	USA_DISC_SW-0002855657
549	USA_DISC_SW-0002855937
550	USA_DISC_SW-0002856114
551	USA_DISC_SW-0002856122
552	USA_DISC_SW-0002856131
553	USA_DISC_SW-0002856140
554	USA_DISC_SW-0002856147
555	USA_DISC_SW-0002856154
556	USA_DISC_SW-0002856769
557	USA_DISC_SW-0002856775
558	USA_DISC_SW-0002856783
559	USA_DISC_SW-0002856987
560	USA_DISC_SW-0002857379

Exhibit A

Page 8

#	Bates Number
561	USA_DISC_SW-0002857389
562	USA_DISC_SW-0002857399
563	USA_DISC_SW-0002857785
564	USA_DISC_SW-0002857834
565	USA_DISC_SW-0002857998
566	USA_DISC_SW-0002858089
567	USA_DISC_SW-0002858101
568	USA_DISC_SW-0002858192
569	USA_DISC_SW-0002858618
570	USA_DISC_SW-0002858827
571	USA_DISC_SW-0002858944
572	USA_DISC_SW-0002859074
573	USA_DISC_SW-0002859404
574	USA_DISC_SW-0002860054
575	USA_DISC_SW-0002860105
576	USA_DISC_SW-0002860107
577	USA_DISC_SW-0002860109
578	USA_DISC_SW-0002860148
579	USA_DISC_SW-0002860694
580	USA_DISC_SW-0002860743
581	USA_DISC_SW-0002860804
582	USA_DISC_SW-0002860907
583	USA_DISC_SW-0002860998
584	USA_DISC_SW-0002861010
585	USA_DISC_SW-0002861101
586	USA_DISC_SW-0002861556
587	USA_DISC_SW-0002862182
588	USA_DISC_SW-0002862660
589	USA_DISC_SW-0002862670
590	USA_DISC_SW-0002863088
591	USA_DISC_SW-0002863096
592	USA_DISC_SW-0002863103
593	USA_DISC_SW-0002863147
594	USA_DISC_SW-0002863549
595	USA_DISC_SW-0002863582
596	USA_DISC_SW-0002864039
597	USA_DISC_SW-0002864078
598	USA_DISC_SW-0002864081
599	USA_DISC_SW-0002864317
600	USA_DISC_SW-0002866115

#	Bates Number
601	USA_DISC_SW-0002866225
602	USA_DISC_SW-0002866255
603	USA_DISC_SW-0002866297
604	USA_DISC_SW-0002866415
605	USA_DISC_SW-0002866416
606	USA_DISC_SW-0002866441
607	USA_DISC_SW-0002866451
608	USA_DISC_SW-0002866757
609	USA_DISC_SW-0002866767
610	USA_DISC_SW-0002866787
611	USA_DISC_SW-0002869826
612	USA_DISC_SW-0002874027
613	USA_DISC_SW-0002880432
614	USA_DISC_SW-0002893787
615	USA_DISC_SW-0002893797
616	USA_DISC_SW-0002893807
617	USA_DISC_SW-0002893817
618	USA_DISC_SW-0002893829
619	USA_DISC_SW-0002893839
620	USA_DISC_SW-0002893849
621	USA_DISC_SW-0002893859
622	USA_DISC_SW-0002893869
623	USA_DISC_SW-0002893879
624	USA_DISC_SW-0002893889
625	USA_DISC_SW-0002895466
626	USA_DISC_SW-0002932524
627	USA_DISC_SW-0002932534
628	USA_DISC_SW-0002932564
629	USA_DISC_SW-0002932574
630	USA_DISC_SW-0002932594
631	USA_DISC_SW-0002932604
632	USA_DISC_SW-0002932614
633	USA_DISC_SW-0002932625
634	USA_DISC_SW-0002932675
635	USA_DISC_SW-0002932685
636	USA_DISC_SW-0002932695
637	USA_DISC_SW-0002932705
638	USA_DISC_SW-0002932715
639	USA_DISC_SW-0002932746
640	USA_DISC_SW-0002932906

Exhibit A

Page 9

#	Bates Number
641	USA_DISC_SW-0002932916
642	USA_DISC_SW-0002932926
643	USA_DISC_SW-0002932936
644	USA_DISC_SW-0002932990
645	USA_DISC_SW-0002933152
646	USA_DISC_SW-0002933187
647	USA_DISC_SW-0002934306
648	USA_DISC_SW-0002937519
649	USA_DISC_SW-0002938074
650	USA_DISC_SW-0002938619
651	USA_DISC_SW-0002938631
652	USA_DISC_SW-0002938640
653	USA_DISC_SW-0002938650
654	USA_DISC_SW-0002938679
655	USA_DISC_SW-0002938727
656	USA_DISC_SW-0002938754
657	USA_DISC_SW-0002938764
658	USA_DISC_SW-0002938774
659	USA_DISC_SW-0002938784
660	USA_DISC_SW-0002938802
661	USA_DISC_SW-0002938812
662	USA_DISC_SW-0002938822
663	USA_DISC_SW-0002939003
664	USA_DISC_SW-0002939180
665	USA_DISC_SW-0002939205
666	USA_DISC_SW-0002939251
667	USA_DISC_SW-0002939333
668	USA_DISC_SW-0002939363
669	USA_DISC_SW-0002939433
670	USA_DISC_SW-0002939443
671	USA_DISC_SW-0002939581
672	USA_DISC_SW-0002939591
673	USA_DISC_SW-0002942875
674	USA_DISC_SW-0002942955
675	USA_DISC_SW-0002942965
676	USA_DISC_SW-0002943377
677	USA_DISC_SW-0002943561
678	USA_DISC_SW-0002943571
679	USA_DISC_SW-0002943581
680	USA_DISC_SW-0002943923

#	Bates Number
681	USA_DISC_SW-0002943976
682	USA_DISC_SW-0002943986
683	USA_DISC_SW-0002943996
684	USA_DISC_SW-0002944026
685	USA_DISC_SW-0002945427
686	USA_DISC_SW-0002945437
687	USA_DISC_SW-0002945800
688	USA_DISC_SW-0002945810
689	USA_DISC_SW-0002945832
690	USA_DISC_SW-0002945886
691	USA_DISC_SW-0002945906
692	USA_DISC_SW-0002945916
693	USA_DISC_SW-0002945943
694	USA_DISC_SW-0002945949
695	USA_DISC_SW-0002945959
696	USA_DISC_SW-0002945961
697	USA_DISC_SW-0002945977
698	USA_DISC_SW-0002945987
699	USA_DISC_SW-0002946073
700	USA_DISC_SW-0002946093
701	USA_DISC_SW-0002946122
702	USA_DISC_SW-0002946159
703	USA_DISC_SW-0002946202
704	USA_DISC_SW-0002946231
705	USA_DISC_SW-0002946267
706	USA_DISC_SW-0002946277
707	USA_DISC_SW-0002946287
708	USA_DISC_SW-0002946297
709	USA_DISC_SW-0002946307
710	USA_DISC_SW-0002946317
711	USA_DISC_SW-0002946327
712	USA_DISC_SW-0002946337
713	USA_DISC_SW-0002946347
714	USA_DISC_SW-0002946357
715	USA_DISC_SW-0002946485
716	USA_DISC_SW-0002946495
717	USA_DISC_SW-0002946505
718	USA_DISC_SW-0002946515
719	USA_DISC_SW-0002946525
720	USA_DISC_SW-0002946535

Exhibit A

Page 10

#	Bates Number
721	USA_DISC_SW-0002946689
722	USA_DISC_SW-0002946709
723	USA_DISC_SW-0002946854
724	USA_DISC_SW-0002948573
725	USA_DISC_SW-0002948583
726	USA_DISC_SW-0002948593
727	USA_DISC_SW-0002948756
728	USA_DISC_SW-0002948962
729	USA_DISC_SW-0002949302
730	USA_DISC_SW-0002949312
731	USA_DISC_SW-0002949724
732	USA_DISC_SW-0002949734
733	USA_DISC_SW-0002949764
734	USA_DISC_SW-0002949788
735	USA_DISC_SW-0002949840
736	USA_DISC_SW-0002949884
737	USA_DISC_SW-0002950252
738	USA_DISC_SW-0002951414
739	USA_DISC_SW-0002956292
740	USA_DISC_SW-0002957223
741	USA_DISC_SW-0002957244
742	USA_DISC_SW-0002957524
743	USA_DISC_SW-0002958941
744	USA_DISC_SW-0002959927
745	USA_DISC_SW-0002959937
746	USA_DISC_SW-0002959947
747	USA_DISC_SW-0002959977
748	USA_DISC_SW-0002959991
749	USA_DISC_SW-0002960011
750	USA_DISC_SW-0002960041
751	USA_DISC_SW-0002960102
752	USA_DISC_SW-0002960736
753	USA_DISC_SW-0002961416
754	USA_DISC_SW-0002962026
755	USA_DISC_SW-0002962876
756	USA_DISC_SW-0002963833
757	USA_DISC_SW-0002965291
758	USA_DISC_SW-0002967570
759	USA_DISC_SW-0002967603
760	USA_DISC_SW-0002975185

#	Bates Number
761	USA_DISC_SW-0002975614
762	USA_DISC_SW-0002975917
763	USA_DISC_SW-0002976050
764	USA_DISC_SW-0002976071
765	USA_DISC_SW-0002976099
766	USA_DISC_SW-0002976109
767	USA_DISC_SW-0002976131
768	USA_DISC_SW-0002976132
769	USA_DISC_SW-0002976921
770	USA_DISC_SW-0002977786
771	USA_DISC_SW-0002983464
772	USA_DISC_SW-0002990199
773	USA_DISC_SW-0002990248
774	USA_DISC_SW-0002990260
775	USA_DISC_SW-0002990309
776	USA_DISC_SW-0002990477
777	USA_DISC_SW-0002990568
778	USA_DISC_SW-0002990580
779	USA_DISC_SW-0002990671
780	USA_DISC_SW-0002991931
781	USA_DISC_SW-0002995607
782	USA_DISC_SW-0002996374
783	USA_DISC_SW-0002996602
784	USA_DISC_SW-0002996633
785	USA_DISC_SW-0002996861
786	USA_DISC_SW-0002997330
787	USA_DISC_SW-0002997503
788	USA_DISC_SW-0003001344
789	USA_DISC_SW-0003001345
790	USA_DISC_SW-0003001858
791	USA_DISC_SW-0003001918
792	USA_DISC_SW-0003002109
793	USA_DISC_SW-0003002324
794	USA_DISC_SW-0003004807
795	USA_DISC_SW-0003004808
796	USA_DISC_SW-0003006724
797	USA_DISC_SW-0003006809
798	USA_DISC_SW-0003006868
799	USA_DISC_SW-0003006907
800	USA_DISC_SW-0003006966

Exhibit A

Page 11

#	Bates Number
801	USA_DISC_SW-0003007446
802	USA_DISC_SW-0003007447
803	USA_DISC_SW-0003007449
804	USA_DISC_SW-0003007451
805	USA_DISC_SW-0003007510
806	USA_DISC_SW-0003007511
807	USA_DISC_SW-0003007513
808	USA_DISC_SW-0003007515
809	USA_DISC_SW-0003007517
810	USA_DISC_SW-0003007518
811	USA_DISC_SW-0003007519
812	USA_DISC_SW-0003007555
813	USA_DISC_SW-0003007556
814	USA_DISC_SW-0003007557
815	USA_DISC_SW-0003007560
816	USA_DISC_SW-0003007561
817	USA_DISC_SW-0003007562
818	USA_DISC_SW-0003007621
819	USA_DISC_SW-0003007690
820	USA_DISC_SW-0003007757
821	USA_DISC_SW-0003008078
822	USA_DISC_SW-0003032267
823	USA_DISC_SW-0003032360
824	USA_DISC_SW-0003032371
825	USA_DISC_SW-0003032573
826	USA_DISC_SW-0003032721
827	USA_DISC_SW-0003033044
828	USA_DISC_SW-0003033062
829	USA_DISC_SW-0003033298
830	USA_DISC_SW-0003033509
831	USA_DISC_SW-0003033563
832	USA_DISC_SW-0003033565
833	USA_DISC_SW-0003033568
834	USA_DISC_SW-0003033673
835	USA_DISC_SW-0003033716
836	USA_DISC_SW-0003033990
837	USA_DISC_SW-0003033991
838	USA_DISC_SW-0003033992
839	USA_DISC_SW-0003033993
840	USA_DISC_SW-0003034042

#	Bates Number
841	USA_DISC_SW-0003034216
842	USA_DISC_SW-0003034466
843	USA_DISC_SW-0003034478
844	USA_DISC_SW-0003034494
845	USA_DISC_SW-0003034554
846	USA_DISC_SW-0003034749
847	USA_DISC_SW-0003034761
848	USA_DISC_SW-0003034801
849	USA_DISC_SW-0003034842
850	USA_DISC_SW-0003035662
851	USA_DISC_SW-0003035674
852	USA_DISC_SW-0003035720
853	USA_DISC_SW-0003035724
854	USA_DISC_SW-0003035728
855	USA_DISC_SW-0003035760
856	USA_DISC_SW-0003035781
857	USA_DISC_SW-0003035792
858	USA_DISC_SW-0003035815
859	USA_DISC_SW-0003035825
860	USA_DISC_SW-0003035985
861	USA_DISC_SW-0003036052
862	USA_DISC_SW-0003036188
863	USA_DISC_SW-0003036621
864	USA_DISC_SW-0003036665
865	USA_DISC_SW-0003036939
866	USA_DISC_SW-0003037106
867	USA_DISC_SW-0003037114
868	USA_DISC_SW-0003037161
869	USA_DISC_SW-0003037221
870	USA_DISC_SW-0003037231
871	USA_DISC_SW-0003037241
872	USA_DISC_SW-0003037448
873	USA_DISC_SW-0003037466
874	USA_DISC_SW-0003037467
875	USA_DISC_SW-0003037477
876	USA_DISC_SW-0003037487
877	USA_DISC_SW-0003037497
878	USA_DISC_SW-0003037498
879	USA_DISC_SW-0003037508
880	USA_DISC_SW-0003037518

Exhibit A

Page 12

#	Bates Number
881	USA_DISC_SW-0003037528
882	USA_DISC_SW-0003037538
883	USA_DISC_SW-0003037548
884	USA_DISC_SW-0003037549
885	USA_DISC_SW-0003037559
886	USA_DISC_SW-0003037569
887	USA_DISC_SW-0003037579
888	USA_DISC_SW-0003038372
889	USA_DISC_SW-0003038382
890	USA_DISC_SW-0003038392
891	USA_DISC_SW-0003038393
892	USA_DISC_SW-0003038394
893	USA_DISC_SW-0003038395
894	USA_DISC_SW-0003038405
895	USA_DISC_SW-0003039449
896	USA_DISC_SW-0003039459
897	USA_DISC_SW-0003039469
898	USA_DISC_SW-0003039491
899	USA_DISC_SW-0003039503
900	USA_DISC_SW-0003039513
901	USA_DISC_SW-0003039523
902	USA_DISC_SW-0003039533
903	USA_DISC_SW-0003039543
904	USA_DISC_SW-0003039553
905	USA_DISC_SW-0003039580
906	USA_DISC_SW-0003039608
907	USA_DISC_SW-0003039622
908	USA_DISC_SW-0003039642
909	USA_DISC_SW-0003039667
910	USA_DISC_SW-0003039677
911	USA_DISC_SW-0003039687
912	USA_DISC_SW-0003039697
913	USA_DISC_SW-0003039707
914	USA_DISC_SW-0003039717
915	USA_DISC_SW-0003039727
916	USA_DISC_SW-0003039768
917	USA_DISC_SW-0003039828
918	USA_DISC_SW-0003039841
919	USA_DISC_SW-0003039875
920	USA_DISC_SW-0003039885

#	Bates Number
921	USA_DISC_SW-0003039895
922	USA_DISC_SW-0003039923
923	USA_DISC_SW-0003039945
924	USA_DISC_SW-0003039987
925	USA_DISC_SW-0003040028
926	USA_DISC_SW-0003040081
927	USA_DISC_SW-0003040091
928	USA_DISC_SW-0003042529
929	USA_DISC_SW-0003042539
930	USA_DISC_SW-0003042677
931	USA_DISC_SW-0003042772
932	USA_DISC_SW-0003042782
933	USA_DISC_SW-0003042792
934	USA_DISC_SW-0003042802
935	USA_DISC_SW-0003042822
936	USA_DISC_SW-0003042832
937	USA_DISC_SW-0003043106
938	USA_DISC_SW-0003043116
939	USA_DISC_SW-0003043137
940	USA_DISC_SW-0003043167
941	USA_DISC_SW-0003043177
942	USA_DISC_SW-0003043187
943	USA_DISC_SW-0003043207
944	USA_DISC_SW-0003043228
945	USA_DISC_SW-0003043238
946	USA_DISC_SW-0003043280
947	USA_DISC_SW-0003043290
948	USA_DISC_SW-0003043302
949	USA_DISC_SW-0003043313
950	USA_DISC_SW-0003043325
951	USA_DISC_SW-0003043345
952	USA_DISC_SW-0003043365
953	USA_DISC_SW-0003043377
954	USA_DISC_SW-0003043387
955	USA_DISC_SW-0003043420
956	USA_DISC_SW-0003043502
957	USA_DISC_SW-0003044372
958	USA_DISC_SW-0003044382
959	USA_DISC_SW-0003044392
960	USA_DISC_SW-0003044405

Exhibit A

Page 13

#	Bates Number
961	USA_DISC_SW-0003044610
962	USA_DISC_SW-0003044630
963	USA_DISC_SW-0003045588
964	USA_DISC_SW-0003045680
965	USA_DISC_SW-0003045690
966	USA_DISC_SW-0003045710
967	USA_DISC_SW-0003045720
968	USA_DISC_SW-0003045760
969	USA_DISC_SW-0003045770
970	USA_DISC_SW-0003045780
971	USA_DISC_SW-0003045790
972	USA_DISC_SW-0003045800
973	USA_DISC_SW-0003045810
974	USA_DISC_SW-0003046037
975	USA_DISC_SW-0003046057
976	USA_DISC_SW-0003046067
977	USA_DISC_SW-0003046097
978	USA_DISC_SW-0003046107
979	USA_DISC_SW-0003046117
980	USA_DISC_SW-0003046147
981	USA_DISC_SW-0003046157
982	USA_DISC_SW-0003046177
983	USA_DISC_SW-0003046187
984	USA_DISC_SW-0003046217
985	USA_DISC_SW-0003046307
986	USA_DISC_SW-0003046317
987	USA_DISC_SW-0003046327
988	USA_DISC_SW-0003046337
989	USA_DISC_SW-0003046387
990	USA_DISC_SW-0003046397
991	USA_DISC_SW-0003046407
992	USA_DISC_SW-0003046417
993	USA_DISC_SW-0003046468
994	USA_DISC_SW-0003046478
995	USA_DISC_SW-0003046488
996	USA_DISC_SW-0003046498
997	USA_DISC_SW-0003046538
998	USA_DISC_SW-0003046548
999	USA_DISC_SW-0003046558
1000	USA_DISC_SW-0003046580

#	Bates Number
1001	USA_DISC_SW-0003046594
1002	USA_DISC_SW-0003046624
1003	USA_DISC_SW-0003046654
1004	USA_DISC_SW-0003046664
1005	USA_DISC_SW-0003046724
1006	USA_DISC_SW-0003046734
1007	USA_DISC_SW-0003046754
1008	USA_DISC_SW-0003046778
1009	USA_DISC_SW-0003046798
1010	USA_DISC_SW-0003046808
1011	USA_DISC_SW-0003046818
1012	USA_DISC_SW-0003046858
1013	USA_DISC_SW-0003046868
1014	USA_DISC_SW-0003046898
1015	USA_DISC_SW-0003046908
1016	USA_DISC_SW-0003046918
1017	USA_DISC_SW-0003046968
1018	USA_DISC_SW-0003046978
1019	USA_DISC_SW-0003047023
1020	USA_DISC_SW-0003047033
1021	USA_DISC_SW-0003047126
1022	USA_DISC_SW-0003047136
1023	USA_DISC_SW-0003047146
1024	USA_DISC_SW-0003047156
1025	USA_DISC_SW-0003047166
1026	USA_DISC_SW-0003047186
1027	USA_DISC_SW-0003047196
1028	USA_DISC_SW-0003047216
1029	USA_DISC_SW-0003047226
1030	USA_DISC_SW-0003047236
1031	USA_DISC_SW-0003047246
1032	USA_DISC_SW-0003047256
1033	USA_DISC_SW-0003047356
1034	USA_DISC_SW-0003047366
1035	USA_DISC_SW-0003047376
1036	USA_DISC_SW-0003047386
1037	USA_DISC_SW-0003047426
1038	USA_DISC_SW-0003047506
1039	USA_DISC_SW-0003047516
1040	USA_DISC_SW-0003047816

Exhibit A

Page 14

#	Bates Number
1041	USA_DISC_SW-0003047934
1042	USA_DISC_SW-0003047944
1043	USA_DISC_SW-0003047964
1044	USA_DISC_SW-0003048072
1045	USA_DISC_SW-0003048082
1046	USA_DISC_SW-0003048092
1047	USA_DISC_SW-0003048102
1048	USA_DISC_SW-0003048103
1049	USA_DISC_SW-0003048113
1050	USA_DISC_SW-0003048123
1051	USA_DISC_SW-0003048133
1052	USA_DISC_SW-0003048143
1053	USA_DISC_SW-0003048153
1054	USA_DISC_SW-0003048163
1055	USA_DISC_SW-0003048173
1056	USA_DISC_SW-0003048183
1057	USA_DISC_SW-0003048193
1058	USA_DISC_SW-0003048253
1059	USA_DISC_SW-0003048273
1060	USA_DISC_SW-0003048283
1061	USA_DISC_SW-0003048483
1062	USA_DISC_SW-0003048503
1063	USA_DISC_SW-0003048523
1064	USA_DISC_SW-0003048634
1065	USA_DISC_SW-0003048644
1066	USA_DISC_SW-0003048654
1067	USA_DISC_SW-0003048664
1068	USA_DISC_SW-0003048678
1069	USA_DISC_SW-0003048688
1070	USA_DISC_SW-0003048708
1071	USA_DISC_SW-0003048718
1072	USA_DISC_SW-0003048728
1073	USA_DISC_SW-0003048738
1074	USA_DISC_SW-0003048748
1075	USA_DISC_SW-0003048758
1076	USA_DISC_SW-0003048768
1077	USA_DISC_SW-0003048778
1078	USA_DISC_SW-0003048788
1079	USA_DISC_SW-0003048798
1080	USA_DISC_SW-0003048838

#	Bates Number
1081	USA_DISC_SW-0003048938
1082	USA_DISC_SW-0003049405
1083	USA_DISC_SW-0003049407
1084	USA_DISC_SW-0003049437
1085	USA_DISC_SW-0003049439
1086	USA_DISC_SW-0003049457
1087	USA_DISC_SW-0003049467
1088	USA_DISC_SW-0003049484
1089	USA_DISC_SW-0003049505
1090	USA_DISC_SW-0003049671
1091	USA_DISC_SW-0003049701
1092	USA_DISC_SW-0003049829
1093	USA_DISC_SW-0003049859
1094	USA_DISC_SW-0003049989
1095	USA_DISC_SW-0003050312
1096	USA_DISC_SW-0003050316
1097	USA_DISC_SW-0003050371
1098	USA_DISC_SW-0003050431
1099	USA_DISC_SW-0003050746
1100	USA_DISC_SW-0003050756
1101	USA_DISC_SW-0003050757
1102	USA_DISC_SW-0003050758
1103	USA_DISC_SW-0003050780
1104	USA_DISC_SW-0003050790
1105	USA_DISC_SW-0003050800
1106	USA_DISC_SW-0003050833
1107	USA_DISC_SW-0003050843
1108	USA_DISC_SW-0003050853
1109	USA_DISC_SW-0003050863
1110	USA_DISC_SW-0003050873
1111	USA_DISC_SW-0003050943
1112	USA_DISC_SW-0003051127
1113	USA_DISC_SW-0003051147
1114	USA_DISC_SW-0003051157
1115	USA_DISC_SW-0003051312
1116	USA_DISC_SW-0003051815
1117	USA_DISC_SW-0003051835
1118	USA_DISC_SW-0003051928
1119	USA_DISC_SW-0003052038
1120	USA_DISC_SW-0003052581

Exhibit A

Page 15

#	Bates Number
1121	USA_DISC_SW-0003052717
1122	USA_DISC_SW-0003052739
1123	USA_DISC_SW-0003052749
1124	USA_DISC_SW-0003052759
1125	USA_DISC_SW-0003052813
1126	USA_DISC_SW-0003052814
1127	USA_DISC_SW-0003052815
1128	USA_DISC_SW-0003052825
1129	USA_DISC_SW-0003052826
1130	USA_DISC_SW-0003052836
1131	USA_DISC_SW-0003052849
1132	USA_DISC_SW-0003052889
1133	USA_DISC_SW-0003052899
1134	USA_DISC_SW-0003052909
1135	USA_DISC_SW-0003052919
1136	USA_DISC_SW-0003052939
1137	USA_DISC_SW-0003052949
1138	USA_DISC_SW-0003052959
1139	USA_DISC_SW-0003052969
1140	USA_DISC_SW-0003052979
1141	USA_DISC_SW-0003052989
1142	USA_DISC_SW-0003053049
1143	USA_DISC_SW-0003053078
1144	USA_DISC_SW-0003053251
1145	USA_DISC_SW-0003053261
1146	USA_DISC_SW-0003053281
1147	USA_DISC_SW-0003053340
1148	USA_DISC_SW-0003053350
1149	USA_DISC_SW-0003053370
1150	USA_DISC_SW-0003053380
1151	USA_DISC_SW-0003053420
1152	USA_DISC_SW-0003054592
1153	USA_DISC_SW-0003054593
1154	USA_DISC_SW-0003056798
1155	USA_DISC_SW-0003056824
1156	USA_DISC_SW-0003057876
1157	USA_DISC_SW-0003057879
1158	USA_DISC_SW-0003057994
1159	USA_DISC_SW-0003058061
1160	USA_DISC_SW-0003058141

#	Bates Number
1161	USA_DISC_SW-0003058263
1162	USA_DISC_SW-0003058273
1163	USA_DISC_SW-0003058293
1164	USA_DISC_SW-0003058313
1165	USA_DISC_SW-0003058314
1166	USA_DISC_SW-0003058324
1167	USA_DISC_SW-0003058354
1168	USA_DISC_SW-0003058364
1169	USA_DISC_SW-0003058398
1170	USA_DISC_SW-0003058408
1171	USA_DISC_SW-0003058418
1172	USA_DISC_SW-0003058548
1173	USA_DISC_SW-0003058649
1174	USA_DISC_SW-0003058697
1175	USA_DISC_SW-0003058750
1176	USA_DISC_SW-0003058799
1177	USA_DISC_SW-0003062021
1178	USA_DISC_SW-0003062031
1179	USA_DISC_SW-0003062166
1180	USA_DISC_SW-0003062176
1181	USA_DISC_SW-0003062237
1182	USA_DISC_SW-0003062247
1183	USA_DISC_SW-0003062318
1184	USA_DISC_SW-0003062388
1185	USA_DISC_SW-0003062398
1186	USA_DISC_SW-0003062440
1187	USA_DISC_SW-0003062450
1188	USA_DISC_SW-0003062458
1189	USA_DISC_SW-0003062468
1190	USA_DISC_SW-0003062485
1191	USA_DISC_SW-0003062495
1192	USA_DISC_SW-0003062505
1193	USA_DISC_SW-0003062525
1194	USA_DISC_SW-0003062537
1195	USA_DISC_SW-0003062547
1196	USA_DISC_SW-0003062651
1197	USA_DISC_SW-0003062661
1198	USA_DISC_SW-0003062681
1199	USA_DISC_SW-0003062711
1200	USA_DISC_SW-0003062751

Exhibit A

Page 16

#	Bates Number
1201	USA_DISC_SW-0003062786
1202	USA_DISC_SW-0003062796
1203	USA_DISC_SW-0003062806
1204	USA_DISC_SW-0003062816
1205	USA_DISC_SW-0003062826
1206	USA_DISC_SW-0003062836
1207	USA_DISC_SW-0003062846
1208	USA_DISC_SW-0003062856
1209	USA_DISC_SW-0003062901
1210	USA_DISC_SW-0003063107
1211	USA_DISC_SW-0003063149
1212	USA_DISC_SW-0003063235
1213	USA_DISC_SW-0003063245
1214	USA_DISC_SW-0003063267
1215	USA_DISC_SW-0003063327
1216	USA_DISC_SW-0003063388
1217	USA_DISC_SW-0003063418
1218	USA_DISC_SW-0003063428
1219	USA_DISC_SW-0003063450
1220	USA_DISC_SW-0003063460
1221	USA_DISC_SW-0003063470
1222	USA_DISC_SW-0003063481
1223	USA_DISC_SW-0003063511
1224	USA_DISC_SW-0003063541
1225	USA_DISC_SW-0003063571
1226	USA_DISC_SW-0003063609
1227	USA_DISC_SW-0003063664
1228	USA_DISC_SW-0003063697
1229	USA_DISC_SW-0003063735
1230	USA_DISC_SW-0003063745
1231	USA_DISC_SW-0003063765
1232	USA_DISC_SW-0003063775
1233	USA_DISC_SW-0003063785
1234	USA_DISC_SW-0003063805
1235	USA_DISC_SW-0003063816
1236	USA_DISC_SW-0003063826
1237	USA_DISC_SW-0003063827
1238	USA_DISC_SW-0003063828
1239	USA_DISC_SW-0003063838
1240	USA_DISC_SW-0003063839

#	Bates Number
1241	USA_DISC_SW-0003063840
1242	USA_DISC_SW-0003063850
1243	USA_DISC_SW-0003063906
1244	USA_DISC_SW-0003063926
1245	USA_DISC_SW-0003063966
1246	USA_DISC_SW-0003063986
1247	USA_DISC_SW-0003063996
1248	USA_DISC_SW-0003064006
1249	USA_DISC_SW-0003064016
1250	USA_DISC_SW-0003064026
1251	USA_DISC_SW-0003064036
1252	USA_DISC_SW-0003064046
1253	USA_DISC_SW-0003064096
1254	USA_DISC_SW-0003064242
1255	USA_DISC_SW-0003064252
1256	USA_DISC_SW-0003064262
1257	USA_DISC_SW-0003064381
1258	USA_DISC_SW-0003064397
1259	USA_DISC_SW-0003064457
1260	USA_DISC_SW-0003064474
1261	USA_DISC_SW-0003064497
1262	USA_DISC_SW-0003065689
1263	USA_DISC_SW-0003065699
1264	USA_DISC_SW-0003065709
1265	USA_DISC_SW-0003065729
1266	USA_DISC_SW-0003065739
1267	USA_DISC_SW-0003065741
1268	USA_DISC_SW-0003065751
1269	USA_DISC_SW-0003065761
1270	USA_DISC_SW-0003065772
1271	USA_DISC_SW-0003065773
1272	USA_DISC_SW-0003065854
1273	USA_DISC_SW-0003065864
1274	USA_DISC_SW-0003065894
1275	USA_DISC_SW-0003065914
1276	USA_DISC_SW-0003065934
1277	USA_DISC_SW-0003065954
1278	USA_DISC_SW-0003066044
1279	USA_DISC_SW-0003066054
1280	USA_DISC_SW-0003066138

Exhibit A

Page 17

#	Bates Number
1281	USA_DISC_SW-0003066187
1282	USA_DISC_SW-0003066202
1283	USA_DISC_SW-0003066217
1284	USA_DISC_SW-0003066233
1285	USA_DISC_SW-0003066294
1286	USA_DISC_SW-0003066304
1287	USA_DISC_SW-0003066308
1288	USA_DISC_SW-0003066312
1289	USA_DISC_SW-0003066316
1290	USA_DISC_SW-0003066643
1291	USA_DISC_SW-0003066645
1292	USA_DISC_SW-0003066647
1293	USA_DISC_SW-0003066649
1294	USA_DISC_SW-0003066667
1295	USA_DISC_SW-0003066734
1296	USA_DISC_SW-0003066796
1297	USA_DISC_SW-0003066816
1298	USA_DISC_SW-0003066826
1299	USA_DISC_SW-0003066837
1300	USA_DISC_SW-0003066877
1301	USA_DISC_SW-0003066897
1302	USA_DISC_SW-0003066948
1303	USA_DISC_SW-0003066959
1304	USA_DISC_SW-0003066998
1305	USA_DISC_SW-0003067205
1306	USA_DISC_SW-0003067225
1307	USA_DISC_SW-0003067250
1308	USA_DISC_SW-0003069134
1309	USA_DISC_SW-0003069144
1310	USA_DISC_SW-0003069154
1311	USA_DISC_SW-0003069181
1312	USA_DISC_SW-0003069210
1313	USA_DISC_SW-0003069251
1314	USA_DISC_SW-0003069281
1315	USA_DISC_SW-0003069299
1316	USA_DISC_SW-0003069309
1317	USA_DISC_SW-0003069319
1318	USA_DISC_SW-0003069389
1319	USA_DISC_SW-0003069459
1320	USA_DISC_SW-0003069469

#	Bates Number
1321	USA_DISC_SW-0003069479
1322	USA_DISC_SW-0003069549
1323	USA_DISC_SW-0003070346
1324	USA_DISC_SW-0003070356
1325	USA_DISC_SW-0003070376
1326	USA_DISC_SW-0003070501
1327	USA_DISC_SW-0003070526
1328	USA_DISC_SW-0003070576
1329	USA_DISC_SW-0003070594
1330	USA_DISC_SW-0003070834
1331	USA_DISC_SW-0003070850
1332	USA_DISC_SW-0003071287
1333	USA_DISC_SW-0003071669
1334	USA_DISC_SW-0003071767
1335	USA_DISC_SW-0003071777
1336	USA_DISC_SW-0003072003
1337	USA_DISC_SW-0003072119
1338	USA_DISC_SW-0003072213
1339	USA_DISC_SW-0003072223
1340	USA_DISC_SW-0003072243
1341	USA_DISC_SW-0003072297
1342	USA_DISC_SW-0003072537
1343	USA_DISC_SW-0003072704
1344	USA_DISC_SW-0003072946
1345	USA_DISC_SW-0003072956
1346	USA_DISC_SW-0003073691
1347	USA_DISC_SW-0003073692
1348	USA_DISC_SW-0003073735
1349	USA_DISC_SW-0003073781
1350	USA_DISC_SW-0003073827
1351	USA_DISC_SW-0003073864
1352	USA_DISC_SW-0003074138
1353	USA_DISC_SW-0003074384
1354	USA_DISC_SW-0003074394
1355	USA_DISC_SW-0003074404
1356	USA_DISC_SW-0003074414
1357	USA_DISC_SW-0003074424
1358	USA_DISC_SW-0003074592
1359	USA_DISC_SW-0003074602
1360	USA_DISC_SW-0003074612

Exhibit A

Page 18

#	Bates Number
1361	USA_DISC_SW-0003074622
1362	USA_DISC_SW-0003074632
1363	USA_DISC_SW-0003074642
1364	USA_DISC_SW-0003074806
1365	USA_DISC_SW-0003074816
1366	USA_DISC_SW-0003075079
1367	USA_DISC_SW-0003076326
1368	USA_DISC_SW-0003076750
1369	USA_DISC_SW-0003076760
1370	USA_DISC_SW-0003076780
1371	USA_DISC_SW-0003076781
1372	USA_DISC_SW-0003076943
1373	USA_DISC_SW-0003077408
1374	USA_DISC_SW-0003077603
1375	USA_DISC_SW-0003077613
1376	USA_DISC_SW-0003077662
1377	USA_DISC_SW-0003077764
1378	USA_DISC_SW-0003078092
1379	USA_DISC_SW-0003078117
1380	USA_DISC_SW-0003078127
1381	USA_DISC_SW-0003078137
1382	USA_DISC_SW-0003078147
1383	USA_DISC_SW-0003078626
1384	USA_DISC_SW-0003078976
1385	USA_DISC_SW-0003080095
1386	USA_DISC_SW-0003080099
1387	USA_DISC_SW-0003080107
1388	USA_DISC_SW-0003080573
1389	USA_DISC_SW-0003081576
1390	USA_DISC_SW-0003081586
1391	USA_DISC_SW-0003081661
1392	USA_DISC_SW-0003081671
1393	USA_DISC_SW-0003081681
1394	USA_DISC_SW-0003082735
1395	USA_DISC_SW-0003082745
1396	USA_DISC_SW-0003082755
1397	USA_DISC_SW-0003083347
1398	USA_DISC_SW-0003083397
1399	USA_DISC_SW-0003083399
1400	USA_DISC_SW-0003083449

#	Bates Number
1401	USA_DISC_SW-0003083471
1402	USA_DISC_SW-0003083527
1403	USA_DISC_SW-0003083590
1404	USA_DISC_SW-0003083601
1405	USA_DISC_SW-0003083602
1406	USA_DISC_SW-0003084223
1407	USA_DISC_SW-0003084233
1408	USA_DISC_SW-0003084293
1409	USA_DISC_SW-0003084778
1410	USA_DISC_SW-0003085445
1411	USA_DISC_SW-0003085801
1412	USA_DISC_SW-0003086048
1413	USA_DISC_SW-0003087454
1414	USA_DISC_SW-0003087755
1415	USA_DISC_SW-0003087889
1416	USA_DISC_SW-0003088019
1417	USA_DISC_SW-0003088218
1418	USA_DISC_SW-0003089838
1419	USA_DISC_SW-0003089859
1420	USA_DISC_SW-0003089879
1421	USA_DISC_SW-0003090306
1422	USA_DISC_SW-0003090564
1423	USA_DISC_SW-0003090796
1424	USA_DISC_SW-0003091564
1425	USA_DISC_SW-0003091588
1426	USA_DISC_SW-0003091592
1427	USA_DISC_SW-0003091596
1428	USA_DISC_SW-0003091674
1429	USA_DISC_SW-0003091690
1430	USA_DISC_SW-0003091995
1431	USA_DISC_SW-0003092165
1432	USA_DISC_SW-0003092458
1433	USA_DISC_SW-0003092615
1434	USA_DISC_SW-0003092622
1435	USA_DISC_SW-0003092627
1436	USA_DISC_SW-0003092660
1437	USA_DISC_SW-0003092664
1438	USA_DISC_SW-0003092700
1439	USA_DISC_SW-0003092809
1440	USA_DISC_SW-0003092922

Exhibit A

Page 19

#	Bates Number
1441	USA_DISC_SW-0003092932
1442	USA_DISC_SW-0003092938
1443	USA_DISC_SW-0003092948
1444	USA_DISC_SW-0003092982
1445	USA_DISC_SW-0003093007
1446	USA_DISC_SW-0003093066
1447	USA_DISC_SW-0003093067
1448	USA_DISC_SW-0003093068
1449	USA_DISC_SW-0003093069
1450	USA_DISC_SW-0003093072
1451	USA_DISC_SW-0003093077
1452	USA_DISC_SW-0003093088
1453	USA_DISC_SW-0003093089
1454	USA_DISC_SW-0003093093
1455	USA_DISC_SW-0003093094
1456	USA_DISC_SW-0003093098
1457	USA_DISC_SW-0003093205
1458	USA_DISC_SW-0003093206
1459	USA_DISC_SW-0003093207
1460	USA_DISC_SW-0003093213
1461	USA_DISC_SW-0003093214
1462	USA_DISC_SW-0003093215
1463	USA_DISC_SW-0003093223
1464	USA_DISC_SW-0003093225
1465	USA_DISC_SW-0003093236
1466	USA_DISC_SW-0003093240
1467	USA_DISC_SW-0003093243
1468	USA_DISC_SW-0003093248
1469	USA_DISC_SW-0003093249
1470	USA_DISC_SW-0003093250
1471	USA_DISC_SW-0003093253
1472	USA_DISC_SW-0003093256
1473	USA_DISC_SW-0003093258
1474	USA_DISC_SW-0003093260
1475	USA_DISC_SW-0003093263
1476	USA_DISC_SW-0003093265
1477	USA_DISC_SW-0003093268
1478	USA_DISC_SW-0003093271
1479	USA_DISC_SW-0003093275
1480	USA_DISC_SW-0003093279

#	Bates Number
1481	USA_DISC_SW-0003093296
1482	USA_DISC_SW-0003093298
1483	USA_DISC_SW-0003093302
1484	USA_DISC_SW-0003093306
1485	USA_DISC_SW-0003093308
1486	USA_DISC_SW-0003093309
1487	USA_DISC_SW-0003093311
1488	USA_DISC_SW-0003093312
1489	USA_DISC_SW-0003093315
1490	USA_DISC_SW-0003093474
1491	USA_DISC_SW-0003093504
1492	USA_DISC_SW-0003093505
1493	USA_DISC_SW-0003094272
1494	USA_DISC_SW-0003095206
1495	USA_DISC_SW-0003095241
1496	USA_DISC_SW-0003095681
1497	USA_DISC_SW-0003097380
1498	USA_DISC_SW-0003097384
1499	USA_DISC_SW-0003097389
1500	USA_DISC_SW-0003097395
1501	USA_DISC_SW-0003097483
1502	USA_DISC_SW-0003097965
1503	USA_DISC_SW-0003097980
1504	USA_DISC_SW-0003098272
1505	USA_DISC_SW-0003098282
1506	USA_DISC_SW-0003098321
1507	USA_DISC_SW-0003098327
1508	USA_DISC_SW-0003098334
1509	USA_DISC_SW-0003098341
1510	USA_DISC_SW-0003098490
1511	USA_DISC_SW-0003098491
1512	USA_DISC_SW-0003098506
1513	USA_DISC_SW-0003098835
1514	USA_DISC_SW-0003098849
1515	USA_DISC_SW-0003098862
1516	USA_DISC_SW-0003098875
1517	USA_DISC_SW-0003098888
1518	USA_DISC_SW-0003099022
1519	USA_DISC_SW-0003099023
1520	USA_DISC_SW-0003099048

Exhibit A

Page 20

#	Bates Number
1521	USA_DISC_SW-0003099051
1522	USA_DISC_SW-0003099052
1523	USA_DISC_SW-0003099056
1524	USA_DISC_SW-0003099063
1525	USA_DISC_SW-0003099069
1526	USA_DISC_SW-0003099077
1527	USA_DISC_SW-0003099084
1528	USA_DISC_SW-0003100981
1529	USA_DISC_SW-0003101193
1530	USA_DISC_SW-0003101208
1531	USA_DISC_SW-0003101691
1532	USA_DISC_SW-0003101699
1533	USA_DISC_SW-0003101752
1534	USA_DISC_SW-0003101811
1535	USA_DISC_SW-0003101820
1536	USA_DISC_SW-0003101829
1537	USA_DISC_SW-0003102352
1538	USA_DISC_SW-0003102367
1539	USA_DISC_SW-0003102382
1540	USA_DISC_SW-0003102676
1541	USA_DISC_SW-0003102815
1542	USA_DISC_SW-0003102923
1543	USA_DISC_SW-0003102947
1544	USA_DISC_SW-0003103060
1545	USA_DISC_SW-0003103067
1546	USA_DISC_SW-0003103074
1547	USA_DISC_SW-0003103077
1548	USA_DISC_SW-0003103087
1549	USA_DISC_SW-0003103289
1550	USA_DISC_SW-0003103290
1551	USA_DISC_SW-0003103293
1552	USA_DISC_SW-0003103300
1553	USA_DISC_SW-0003103307
1554	USA_DISC_SW-0003103344
1555	USA_DISC_SW-0003103512
1556	USA_DISC_SW-0003103514
1557	USA_DISC_SW-0003103531
1558	USA_DISC_SW-0003103533
1559	USA_DISC_SW-0003103559
1560	USA_DISC_SW-0003103561

#	Bates Number
1561	USA_DISC_SW-0003103565
1562	USA_DISC_SW-0003103571
1563	USA_DISC_SW-0003103573
1564	USA_DISC_SW-0003103574
1565	USA_DISC_SW-0003103577
1566	USA_DISC_SW-0003103593
1567	USA_DISC_SW-0003103623
1568	USA_DISC_SW-0003103685
1569	USA_DISC_SW-0003103728
1570	USA_DISC_SW-0003103737
1571	USA_DISC_SW-0003103795
1572	USA_DISC_SW-0003103797
1573	USA_DISC_SW-0003103801
1574	USA_DISC_SW-0003103840
1575	USA_DISC_SW-0003103857
1576	USA_DISC_SW-0003103887
1577	USA_DISC_SW-0003103955
1578	USA_DISC_SW-0003104026
1579	USA_DISC_SW-0003104207
1580	USA_DISC_SW-0003104208
1581	USA_DISC_SW-0003104297
1582	USA_DISC_SW-0003104299
1583	USA_DISC_SW-0003104365
1584	USA_DISC_SW-0003104368
1585	USA_DISC_SW-0003104370
1586	USA_DISC_SW-0003104518
1587	USA_DISC_SW-0003104577
1588	USA_DISC_SW-0003104969
1589	USA_DISC_SW-0003105020
1590	USA_DISC_SW-0003105208
1591	USA_DISC_SW-0003105335
1592	USA_DISC_SW-0003105482
1593	USA_DISC_SW-0003105780
1594	USA_DISC_SW-0003105783
1595	USA_DISC_SW-0003106702
1596	USA_DISC_SW-0003106936
1597	USA_DISC_SW-0003107019
1598	USA_DISC_SW-0003107320
1599	USA_DISC_SW-0003107769
1600	USA_DISC_SW-0003107806

Exhibit A

Page 21

#	Bates Number
1601	USA_DISC_SW-0003108350
1602	USA_DISC_SW-0003108519
1603	USA_DISC_SW-0003109041
1604	USA_DISC_SW-0003109882
1605	USA_DISC_SW-0003109986
1606	USA_DISC_SW-0003109999
1607	USA_DISC_SW-0003110056
1608	USA_DISC_SW-0003110381
1609	USA_DISC_SW-0003110836
1610	USA_DISC_SW-0003110895
1611	USA_DISC_SW-0003111040
1612	USA_DISC_SW-0003111212
1613	USA_DISC_SW-0003113571
1614	USA_DISC_SW-0003113580
1615	USA_DISC_SW-0003113596
1616	USA_DISC_SW-0003114995
1617	USA_DISC_SW-0003115214
1618	USA_DISC_SW-0003115235
1619	USA_DISC_SW-0003115245
1620	USA_DISC_SW-0003115255
1621	USA_DISC_SW-0003115295
1622	USA_DISC_SW-0003115335
1623	USA_DISC_SW-0003115355
1624	USA_DISC_SW-0003115895
1625	USA_DISC_SW-0003115905
1626	USA_DISC_SW-0003115915
1627	USA_DISC_SW-0003116005
1628	USA_DISC_SW-0003116025
1629	USA_DISC_SW-0003116065
1630	USA_DISC_SW-0003116147
1631	USA_DISC_SW-0003116200
1632	USA_DISC_SW-0003116210
1633	USA_DISC_SW-0003116300
1634	USA_DISC_SW-0003116320
1635	USA_DISC_SW-0003116360
1636	USA_DISC_SW-0003116504
1637	USA_DISC_SW-0003118350
1638	USA_DISC_SW-0003118428
1639	USA_DISC_SW-0003118431
1640	USA_DISC_SW-0003118465

#	Bates Number
1641	USA_DISC_SW-0003118472
1642	USA_DISC_SW-0003118496
1643	USA_DISC_SW-0003118520
1644	USA_DISC_SW-0003118561
1645	USA_DISC_SW-0003119493
1646	USA_DISC_SW-0003119924
1647	USA_DISC_SW-0003123858
1648	USA_DISC_SW-0003123978
1649	USA_DISC_SW-0003124521
1650	USA_DISC_SW-0003124791
1651	USA_DISC_SW-0003124836
1652	USA_DISC_SW-0003124931
1653	USA_DISC_SW-0003124953
1654	USA_DISC_SW-0003124975
1655	USA_DISC_SW-0003125223
1656	USA_DISC_SW-0003125235
1657	USA_DISC_SW-0003127902
1658	USA_DISC_SW-0003127929
1659	USA_DISC_SW-0003127956
1660	USA_DISC_SW-0003127969
1661	USA_DISC_SW-0003128007
1662	USA_DISC_SW-0003128446
1663	USA_DISC_SW-0003129593
1664	USA_DISC_SW-0003129623
1665	USA_DISC_SW-0003129706
1666	USA_DISC_SW-0003129849
1667	USA_DISC_SW-0003129855
1668	USA_DISC_SW-0003129861
1669	USA_DISC_SW-0003129868
1670	USA_DISC_SW-0003131450
1671	USA_DISC_SW-0003131685
1672	USA_DISC_SW-0003131920
1673	USA_DISC_SW-0003132543
1674	USA_DISC_SW-0003133606
1675	USA_DISC_SW-0003133618
1676	USA_DISC_SW-0003133630
1677	USA_DISC_SW-0003133919
1678	USA_DISC_SW-0003134301
1679	USA_DISC_SW-0003134536
1680	USA_DISC_SW-0003134556

Exhibit A

Page 22

#	Bates Number
1681	USA_DISC_SW-0003134792
1682	USA_DISC_SW-0003135526
1683	USA_DISC_SW-0003135802
1684	USA_DISC_SW-0003137995
1685	USA_DISC_SW-0003138244
1686	USA_DISC_SW-0003138378
1687	USA_DISC_SW-0003143944
1688	USA_DISC_SW-0003143950
1689	USA_DISC_SW-0003145802
1690	USA_DISC_SW-0003145809
1691	USA_DISC_SW-0003145814
1692	USA_DISC_SW-0003146157
1693	USA_DISC_SW-0003146159
1694	USA_DISC_SW-0003147011
1695	USA_DISC_SW-0003147018
1696	USA_DISC_SW-0003147840
1697	USA_DISC_SW-0003151718
1698	USA_DISC_SW-0003151734
1699	USA_DISC_SW-0003151737
1700	USA_DISC_SW-0003152046
1701	USA_DISC_SW-0003152050
1702	USA_DISC_SW-0003152116
1703	USA_DISC_SW-0003152238
1704	USA_DISC_SW-0003152327
1705	USA_DISC_SW-0003152342
1706	USA_DISC_SW-0003152353
1707	USA_DISC_SW-0003152364
1708	USA_DISC_SW-0003152427
1709	USA_DISC_SW-0003152815
1710	USA_DISC_SW-0003152826
1711	USA_DISC_SW-0003152837
1712	USA_DISC_SW-0003152876
1713	USA_DISC_SW-0003152943
1714	USA_DISC_SW-0003152964
1715	USA_DISC_SW-0003153005
1716	USA_DISC_SW-0003153017
1717	USA_DISC_SW-0003153030
1718	USA_DISC_SW-0003153046
1719	USA_DISC_SW-0003153059
1720	USA_DISC_SW-0003153073

#	Bates Number
1721	USA_DISC_SW-0003153087
1722	USA_DISC_SW-0003153102
1723	USA_DISC_SW-0003153120
1724	USA_DISC_SW-0003153140
1725	USA_DISC_SW-0003153161
1726	USA_DISC_SW-0003153182
1727	USA_DISC_SW-0003153203
1728	USA_DISC_SW-0003153219
1729	USA_DISC_SW-0003153246
1730	USA_DISC_SW-0003153573
1731	USA_DISC_SW-0003153817
1732	USA_DISC_SW-0003153898
1733	USA_DISC_SW-0003153904
1734	USA_DISC_SW-0003153906
1735	USA_DISC_SW-0003153913
1736	USA_DISC_SW-0003153915
1737	USA_DISC_SW-0003153918
1738	USA_DISC_SW-0003153946
1739	USA_DISC_SW-0003153947
1740	USA_DISC_SW-0003153953
1741	USA_DISC_SW-0003153954
1742	USA_DISC_SW-0003153955
1743	USA_DISC_SW-0003153961
1744	USA_DISC_SW-0003153962
1745	USA_DISC_SW-0003153963
1746	USA_DISC_SW-0003153969
1747	USA_DISC_SW-0003154112
1748	USA_DISC_SW-0003154129
1749	USA_DISC_SW-0003154151
1750	USA_DISC_SW-0003154154
1751	USA_DISC_SW-0003154527
1752	USA_DISC_SW-0003154567
1753	USA_DISC_SW-0003156443
1754	USA_DISC_SW-0003156486
1755	USA_DISC_SW-0003156496
1756	USA_DISC_SW-0003156596
1757	USA_DISC_SW-0003156616
1758	USA_DISC_SW-0003156656
1759	USA_DISC_SW-0003158491
1760	USA_DISC_SW-0003158492

Exhibit A

Page 23

#	Bates Number
1761	USA_DISC_SW-0003158515
1762	USA_DISC_SW-0003158535
1763	USA_DISC_SW-0003158536
1764	USA_DISC_SW-0003158559
1765	USA_DISC_SW-0003158579
1766	USA_DISC_SW-0003158580
1767	USA_DISC_SW-0003158603
1768	USA_DISC_SW-0003159729
1769	USA_DISC_SW-0003159747
1770	USA_DISC_SW-0003159825
1771	USA_DISC_SW-0003159844
1772	USA_DISC_SW-0003159863
1773	USA_DISC_SW-0003159996
1774	USA_DISC_SW-0003160169
1775	USA_DISC_SW-0003160398
1776	USA_DISC_SW-0003160419
1777	USA_DISC_SW-0003160440
1778	USA_DISC_SW-0003160469
1779	USA_DISC_SW-0003160482
1780	USA_DISC_SW-0003160727
1781	USA_DISC_SW-0003160816
1782	USA_DISC_SW-0003160836
1783	USA_DISC_SW-0003160876
1784	USA_DISC_SW-0003160901
1785	USA_DISC_SW-0003160922
1786	USA_DISC_SW-0003160943
1787	USA_DISC_SW-0003160965
1788	USA_DISC_SW-0003161060
1789	USA_DISC_SW-0003161080
1790	USA_DISC_SW-0003161101
1791	USA_DISC_SW-0003161126
1792	USA_DISC_SW-0003161151
1793	USA_DISC_SW-0003161165
1794	USA_DISC_SW-0003161186
1795	USA_DISC_SW-0003161207
1796	USA_DISC_SW-0003161228
1797	USA_DISC_SW-0003161250
1798	USA_DISC_SW-0003161495
1799	USA_DISC_SW-0003161749
1800	USA_DISC_SW-0003162004

#	Bates Number
1801	USA_DISC_SW-0003162028
1802	USA_DISC_SW-0003162049
1803	USA_DISC_SW-0003162077
1804	USA_DISC_SW-0003162114
1805	USA_DISC_SW-0003162137
1806	USA_DISC_SW-0003162170
1807	USA_DISC_SW-0003162459
1808	USA_DISC_SW-0003162468
1809	USA_DISC_SW-0003162674
1810	USA_DISC_SW-0003162688
1811	USA_DISC_SW-0003162749
1812	USA_DISC_SW-0003163019
1813	USA_DISC_SW-0003163025
1814	USA_DISC_SW-0003163053
1815	USA_DISC_SW-0003163250
1816	USA_DISC_SW-0003163262
1817	USA_DISC_SW-0003163309
1818	USA_DISC_SW-0003163391
1819	USA_DISC_SW-0003163529
1820	USA_DISC_SW-0003163534
1821	USA_DISC_SW-0003163549
1822	USA_DISC_SW-0003163556
1823	USA_DISC_SW-0003163564
1824	USA_DISC_SW-0003163573
1825	USA_DISC_SW-0003163581
1826	USA_DISC_SW-0003163732
1827	USA_DISC_SW-0003164148
1828	USA_DISC_SW-0003164187
1829	USA_DISC_SW-0003164254
1830	USA_DISC_SW-0003164302
1831	USA_DISC_SW-0003164312
1832	USA_DISC_SW-0003164332
1833	USA_DISC_SW-0003164364
1834	USA_DISC_SW-0003164380
1835	USA_DISC_SW-0003164760
1836	USA_DISC_SW-0003164768
1837	USA_DISC_SW-0003165295
1838	USA_DISC_SW-0003165298
1839	USA_DISC_SW-0003165301
1840	USA_DISC_SW-0003165304

Exhibit A

Page 24

#	Bates Number
1841	USA_DISC_SW-0003165442
1842	USA_DISC_SW-0003165452
1843	USA_DISC_SW-0003165462
1844	USA_DISC_SW-0003165485
1845	USA_DISC_SW-0003165495
1846	USA_DISC_SW-0003165505
1847	USA_DISC_SW-0003165535
1848	USA_DISC_SW-0003165565
1849	USA_DISC_SW-0003165595
1850	USA_DISC_SW-0003165605
1851	USA_DISC_SW-0003165615
1852	USA_DISC_SW-0003165655
1853	USA_DISC_SW-0003166321
1854	USA_DISC_SW-0003166334
1855	USA_DISC_SW-0003166344
1856	USA_DISC_SW-0003166354
1857	USA_DISC_SW-0003166366
1858	USA_DISC_SW-0003166376
1859	USA_DISC_SW-0003166386
1860	USA_DISC_SW-0003166400
1861	USA_DISC_SW-0003166420
1862	USA_DISC_SW-0003166451
1863	USA_DISC_SW-0003166461
1864	USA_DISC_SW-0003166468
1865	USA_DISC_SW-0003166475
1866	USA_DISC_SW-0003166480
1867	USA_DISC_SW-0003166485
1868	USA_DISC_SW-0003166508
1869	USA_DISC_SW-0003166518
1870	USA_DISC_SW-0003166628
1871	USA_DISC_SW-0003166699
1872	USA_DISC_SW-0003166828
1873	USA_DISC_SW-0003166880
1874	USA_DISC_SW-0003166890
1875	USA_DISC_SW-0003166900
1876	USA_DISC_SW-0003166916
1877	USA_DISC_SW-0003166989
1878	USA_DISC_SW-0003167030
1879	USA_DISC_SW-0003167034
1880	USA_DISC_SW-0003167045

#	Bates Number
1881	USA_DISC_SW-0003167579
1882	USA_DISC_SW-0003167632
1883	USA_DISC_SW-0003167642
1884	USA_DISC_SW-0003167782
1885	USA_DISC_SW-0003167851
1886	USA_DISC_SW-0003167962
1887	USA_DISC_SW-0003168060
1888	USA_DISC_SW-0003168110
1889	USA_DISC_SW-0003168120
1890	USA_DISC_SW-0003168195
1891	USA_DISC_SW-0003168393
1892	USA_DISC_SW-0003168403
1893	USA_DISC_SW-0003168413
1894	USA_DISC_SW-0003168439
1895	USA_DISC_SW-0003168449
1896	USA_DISC_SW-0003168459
1897	USA_DISC_SW-0003168495
1898	USA_DISC_SW-0003168523
1899	USA_DISC_SW-0003168533
1900	USA_DISC_SW-0003168551
1901	USA_DISC_SW-0003168561
1902	USA_DISC_SW-0003168571
1903	USA_DISC_SW-0003168575
1904	USA_DISC_SW-0003169282
1905	USA_DISC_SW-0003169630
1906	USA_DISC_SW-0003169640
1907	USA_DISC_SW-0003169644
1908	USA_DISC_SW-0003169654
1909	USA_DISC_SW-0003169813
1910	USA_DISC_SW-0003169840
1911	USA_DISC_SW-0003169841
1912	USA_DISC_SW-0003171191
1913	USA_DISC_SW-0003171305
1914	USA_DISC_SW-0003171645
1915	USA_DISC_SW-0003172800
1916	USA_DISC_SW-0003172833
1917	USA_DISC_SW-0003172843
1918	USA_DISC_SW-0003172865
1919	USA_DISC_SW-0003172885
1920	USA_DISC_SW-0003172889

Exhibit A

Page 25

#	Bates Number
1921	USA_DISC_SW-0003172893
1922	USA_DISC_SW-0003173060
1923	USA_DISC_SW-0003174374
1924	USA_DISC_SW-0003174384
1925	USA_DISC_SW-0003174394
1926	USA_DISC_SW-0003174404
1927	USA_DISC_SW-0003174414
1928	USA_DISC_SW-0003174965
1929	USA_DISC_SW-0003175001
1930	USA_DISC_SW-0003175011
1931	USA_DISC_SW-0003175021
1932	USA_DISC_SW-0003175048
1933	USA_DISC_SW-0003175075
1934	USA_DISC_SW-0003175110
1935	USA_DISC_SW-0003175158
1936	USA_DISC_SW-0003175170
1937	USA_DISC_SW-0003175182
1938	USA_DISC_SW-0003175389
1939	USA_DISC_SW-0003175413
1940	USA_DISC_SW-0003175438
1941	USA_DISC_SW-0003175462
1942	USA_DISC_SW-0003175497
1943	USA_DISC_SW-0003175521
1944	USA_DISC_SW-0003175531
1945	USA_DISC_SW-0003175570
1946	USA_DISC_SW-0003175592
1947	USA_DISC_SW-0003175640
1948	USA_DISC_SW-0003175651
1949	USA_DISC_SW-0003175675
1950	USA_DISC_SW-0003175699
1951	USA_DISC_SW-0003175714
1952	USA_DISC_SW-0003175776
1953	USA_DISC_SW-0003175800
1954	USA_DISC_SW-0003175815
1955	USA_DISC_SW-0003175832
1956	USA_DISC_SW-0003175867
1957	USA_DISC_SW-0003175914
1958	USA_DISC_SW-0003175952
1959	USA_DISC_SW-0003177704
1960	USA_DISC_SW-0003177796

#	Bates Number
1961	USA_DISC_SW-0003179449
1962	USA_DISC_SW-0003179460
1963	USA_DISC_SW-0003179471
1964	USA_DISC_SW-0003179650
1965	USA_DISC_SW-0003179671
1966	USA_DISC_SW-0003179692
1967	USA_DISC_SW-0003179820
1968	USA_DISC_SW-0003179821
1969	USA_DISC_SW-0003179827
1970	USA_DISC_SW-0003179828
1971	USA_DISC_SW-0003179834
1972	USA_DISC_SW-0003179835
1973	USA_DISC_SW-0003179841
1974	USA_DISC_SW-0003179842
1975	USA_DISC_SW-0003179848
1976	USA_DISC_SW-0003179849
1977	USA_DISC_SW-0003179850
1978	USA_DISC_SW-0003179856
1979	USA_DISC_SW-0003179857
1980	USA_DISC_SW-0003179858
1981	USA_DISC_SW-0003179864
1982	USA_DISC_SW-0003180054
1983	USA_DISC_SW-0003180055
1984	USA_DISC_SW-0003180078
1985	USA_DISC_SW-0003180098
1986	USA_DISC_SW-0003180099
1987	USA_DISC_SW-0003180122
1988	USA_DISC_SW-0003180142
1989	USA_DISC_SW-0003180143
1990	USA_DISC_SW-0003180166
1991	USA_DISC_SW-0003180413
1992	USA_DISC_SW-0003180684
1993	USA_DISC_SW-0003181098
1994	USA_DISC_SW-0003181755
1995	USA_DISC_SW-0003181765
1996	USA_DISC_SW-0003181781
1997	USA_DISC_SW-0003181811
1998	USA_DISC_SW-0003182058
1999	USA_DISC_SW-0003182127
2000	USA_DISC_SW-0003182579

Exhibit A

Page 26

#	Bates Number
2001	USA_DISC_SW-0003182585
2002	USA_DISC_SW-0003182744
2003	USA_DISC_SW-0003182879
2004	USA_DISC_SW-0003182889
2005	USA_DISC_SW-0003182949
2006	USA_DISC_SW-0003182960
2007	USA_DISC_SW-0003182966
2008	USA_DISC_SW-0003183206
2009	USA_DISC_SW-0003183213
2010	USA_DISC_SW-0003183228
2011	USA_DISC_SW-0003183930
2012	USA_DISC_SW-0003183935
2013	USA_DISC_SW-0003184447
2014	USA_DISC_SW-0003184467
2015	USA_DISC_SW-0003184501
2016	USA_DISC_SW-0003184520
2017	USA_DISC_SW-0003185294
2018	USA_DISC_SW-0003185323
2019	USA_DISC_SW-0003185326
2020	USA_DISC_SW-0003185331
2021	USA_DISC_SW-0003185337
2022	USA_DISC_SW-0003185408
2023	USA_DISC_SW-0003185995
2024	USA_DISC_SW-0003186201
2025	USA_DISC_SW-0003186366
2026	USA_DISC_SW-0003187557
2027	USA_DISC_SW-0003187563
2028	USA_DISC_SW-0003188452
2029	USA_DISC_SW-0003188463
2030	USA_DISC_SW-0003188481
2031	USA_DISC_SW-0003189365
2032	USA_DISC_SW-0003189375
2033	USA_DISC_SW-0003189926
2034	USA_DISC_SW-0003189944
2035	USA_DISC_SW-0003190099
2036	USA_DISC_SW-0003190402
2037	USA_DISC_SW-0003190446
2038	USA_DISC_SW-0003190490
2039	USA_DISC_SW-0003190649
2040	USA_DISC_SW-0003190738

#	Bates Number
2041	USA_DISC_SW-0003195019
2042	USA_DISC_SW-0003195022
2043	USA_DISC_SW-0003195037
2044	USA_DISC_SW-0003195052
2045	USA_DISC_SW-0003195059
2046	USA_DISC_SW-0003195069
2047	USA_DISC_SW-0003195491
2048	USA_DISC_SW-0003195530
2049	USA_DISC_SW-0003197736
2050	USA_DISC_SW-0003197737
2051	USA_DISC_SW-0003198540
2052	USA_DISC_SW-0003198546
2053	USA_DISC_SW-0003198926
2054	USA_DISC_SW-0003198937
2055	USA_DISC_SW-0003198948
2056	USA_DISC_SW-0003199022
2057	USA_DISC_SW-0003200061
2058	USA_DISC_SW-0003200126
2059	USA_DISC_SW-0003200582
2060	USA_DISC_SW-0003200591
2061	USA_DISC_SW-0003200606
2062	USA_DISC_SW-0003200617
2063	USA_DISC_SW-0003200653
2064	USA_DISC_SW-0003200727
2065	USA_DISC_SW-0003200740
2066	USA_DISC_SW-0003200753
2067	USA_DISC_SW-0003201127
2068	USA_DISC_SW-0003201946
2069	USA_DISC_SW-0003202005
2070	USA_DISC_SW-0003202015
2071	USA_DISC_SW-0003202079
2072	USA_DISC_SW-0003202089
2073	USA_DISC_SW-0003202153
2074	USA_DISC_SW-0003202163
2075	USA_DISC_SW-0003202245
2076	USA_DISC_SW-0003202542
2077	USA_DISC_SW-0003202553
2078	USA_DISC_SW-0003202575
2079	USA_DISC_SW-0003202586
2080	USA_DISC_SW-0003202608

Exhibit A

Page 27

#	Bates Number
2081	USA_DISC_SW-0003202619
2082	USA_DISC_SW-0003203871
2083	USA_DISC_SW-0003203908
2084	USA_DISC_SW-0003203909
2085	USA_DISC_SW-0003203962
2086	USA_DISC_SW-0003203982
2087	USA_DISC_SW-0003204150
2088	USA_DISC_SW-0003204646
2089	USA_DISC_SW-0003204683
2090	USA_DISC_SW-0003204776
2091	USA_DISC_SW-0003205237
2092	USA_DISC_SW-0003205328
2093	USA_DISC_SW-0003205493
2094	USA_DISC_SW-0003205608
2095	USA_DISC_SW-0003205696
2096	USA_DISC_SW-0003205807
2097	USA_DISC_SW-0003205813
2098	USA_DISC_SW-0003206013
2099	USA_DISC_SW-0003206208
2100	USA_DISC_SW-0003206305
2101	USA_DISC_SW-0003206306
2102	USA_DISC_SW-0003206394
2103	USA_DISC_SW-0003206395
2104	USA_DISC_SW-0003206488
2105	USA_DISC_SW-0003206593
2106	USA_DISC_SW-0003206615
2107	USA_DISC_SW-0003206616
2108	USA_DISC_SW-0003206617
2109	USA_DISC_SW-0003206618
2110	USA_DISC_SW-0003206631
2111	USA_DISC_SW-0003206636
2112	USA_DISC_SW-0003206909
2113	USA_DISC_SW-0003206993
2114	USA_DISC_SW-0003207121
2115	USA_DISC_SW-0003207274
2116	USA_DISC_SW-0003207431
2117	USA_DISC_SW-0003207480
2118	USA_DISC_SW-0003207671
2119	USA_DISC_SW-0003207758
2120	USA_DISC_SW-0003207846

#	Bates Number
2121	USA_DISC_SW-0003207939
2122	USA_DISC_SW-0003207976
2123	USA_DISC_SW-0003208000
2124	USA_DISC_SW-0003208029
2125	USA_DISC_SW-0003208113
2126	USA_DISC_SW-0003208219
2127	USA_DISC_SW-0003208304
2128	USA_DISC_SW-0003208401
2129	USA_DISC_SW-0003208494
2130	USA_DISC_SW-0003208605
2131	USA_DISC_SW-0003208693
2132	USA_DISC_SW-0003208930
2133	USA_DISC_SW-0003209019
2134	USA_DISC_SW-0003209110
2135	USA_DISC_SW-0003209238
2136	USA_DISC_SW-0003209478
2137	USA_DISC_SW-0003209591
2138	USA_DISC_SW-0003209746
2139	USA_DISC_SW-0003210126
2140	USA_DISC_SW-0003210131
2141	USA_DISC_SW-0003210136
2142	USA_DISC_SW-0003210137
2143	USA_DISC_SW-0003210138
2144	USA_DISC_SW-0003210151
2145	USA_DISC_SW-0003210158
2146	USA_DISC_SW-0003210843
2147	USA_DISC_SW-0003211337
2148	USA_DISC_SW-0003211579
2149	USA_DISC_SW-0003211666
2150	USA_DISC_SW-0003212038
2151	USA_DISC_SW-0003213815
2152	USA_DISC_SW-0003214259
2153	USA_DISC_SW-0003214525
2154	USA_DISC_SW-0003214531
2155	USA_DISC_SW-0003214540
2156	USA_DISC_SW-0003214909
2157	USA_DISC_SW-0003214976
2158	USA_DISC_SW-0003215046
2159	USA_DISC_SW-0003215103
2160	USA_DISC_SW-0003216175

Exhibit A

Page 28

#	Bates Number
2161	USA_DISC_SW-0003216180
2162	USA_DISC_SW-0003216184
2163	USA_DISC_SW-0003216197
2164	USA_DISC_SW-0003216201
2165	USA_DISC_SW-0003216205
2166	USA_DISC_SW-0003216210
2167	USA_DISC_SW-0003216219
2168	USA_DISC_SW-0003216223
2169	USA_DISC_SW-0003216229
2170	USA_DISC_SW-0003216243
2171	USA_DISC_SW-0003216247
2172	USA_DISC_SW-0003216251
2173	USA_DISC_SW-0003216448
2174	USA_DISC_SW-0003216459
2175	USA_DISC_SW-0003216464
2176	USA_DISC_SW-0003216509
2177	USA_DISC_SW-0003217011
2178	USA_DISC_SW-0003217029
2179	USA_DISC_SW-0003217059
2180	USA_DISC_SW-0003217093
2181	USA_DISC_SW-0003217191
2182	USA_DISC_SW-0003217540
2183	USA_DISC_SW-0003217616
2184	USA_DISC_SW-0003217642
2185	USA_DISC_SW-0003218014
2186	USA_DISC_SW-0003218389
2187	USA_DISC_SW-0003218897
2188	USA_DISC_SW-0003218908
2189	USA_DISC_SW-0003218914
2190	USA_DISC_SW-0003218922
2191	USA_DISC_SW-0003218927
2192	USA_DISC_SW-0003218932
2193	USA_DISC_SW-0003218938
2194	USA_DISC_SW-0003218944
2195	USA_DISC_SW-0003218950
2196	USA_DISC_SW-0003218956
2197	USA_DISC_SW-0003218962
2198	USA_DISC_SW-0003218972
2199	USA_DISC_SW-0003218980
2200	USA_DISC_SW-0003218991

#	Bates Number
2201	USA_DISC_SW-0003219002
2202	USA_DISC_SW-0003219007
2203	USA_DISC_SW-0003219012
2204	USA_DISC_SW-0003219017
2205	USA_DISC_SW-0003219021
2206	USA_DISC_SW-0003219026
2207	USA_DISC_SW-0003219032
2208	USA_DISC_SW-0003219038
2209	USA_DISC_SW-0003219043
2210	USA_DISC_SW-0003219049
2211	USA_DISC_SW-0003219055
2212	USA_DISC_SW-0003219112
2213	USA_DISC_SW-0003219135
2214	USA_DISC_SW-0003219167
2215	USA_DISC_SW-0003219537
2216	USA_DISC_SW-0003219663
2217	USA_DISC_SW-0003219824
2218	USA_DISC_SW-0003219931
2219	USA_DISC_SW-0003220016
2220	USA_DISC_SW-0003220121
2221	USA_DISC_SW-0003220384
2222	USA_DISC_SW-0003222201
2223	USA_DISC_SW-0003222745
2224	USA_DISC_SW-0003223398
2225	USA_DISC_SW-0003223604
2226	USA_DISC_SW-0003223699
2227	USA_DISC_SW-0003224508
2228	USA_DISC_SW-0003224708
2229	USA_DISC_SW-0003224908
2230	USA_DISC_SW-0003225108
2231	USA_DISC_SW-0003225308
2232	USA_DISC_SW-0003225772
2233	USA_DISC_SW-0003226738
2234	USA_DISC_SW-0003227898
2235	USA_DISC_SW-0003227932
2236	USA_DISC_SW-0003227942
2237	USA_DISC_SW-0003228521
2238	USA_DISC_SW-0003228570
2239	USA_DISC_SW-0003228578
2240	USA_DISC_SW-0003228584

Exhibit A

Page 29

#	Bates Number
2241	USA_DISC_SW-0003228589
2242	USA_DISC_SW-0003228593
2243	USA_DISC_SW-0003228599
2244	USA_DISC_SW-0003228604
2245	USA_DISC_SW-0003228610
2246	USA_DISC_SW-0003228627
2247	USA_DISC_SW-0003228636
2248	USA_DISC_SW-0003228659
2249	USA_DISC_SW-0003228664
2250	USA_DISC_SW-0003228669
2251	USA_DISC_SW-0003228698
2252	USA_DISC_SW-0003228704
2253	USA_DISC_SW-0003228710
2254	USA_DISC_SW-0003228720
2255	USA_DISC_SW-0003228746
2256	USA_DISC_SW-0003228756
2257	USA_DISC_SW-0003228765
2258	USA_DISC_SW-0003228774
2259	USA_DISC_SW-0003228784
2260	USA_DISC_SW-0003228792
2261	USA_DISC_SW-0003228955
2262	USA_DISC_SW-0003229307
2263	USA_DISC_SW-0003230714
2264	USA_DISC_SW-0003234451
2265	USA_DISC_SW-0003234634
2266	USA_DISC_SW-0003234760
2267	USA_DISC_SW-0003235085
2268	USA_DISC_SW-0003235511
2269	USA_DISC_SW-0003235595
2270	USA_DISC_SW-0003236991
2271	USA_DISC_SW-0003237115
2272	USA_DISC_SW-0003237264
2273	USA_DISC_SW-0003237982
2274	USA_DISC_SW-0003238199
2275	USA_DISC_SW-0003238242
2276	USA_DISC_SW-0003238243
2277	USA_DISC_SW-0003238657
2278	USA_DISC_SW-0003239437
2279	USA_DISC_SW-0003240245
2280	USA_DISC_SW-0003240446

#	Bates Number
2281	USA_DISC_SW-0003240489
2282	USA_DISC_SW-0003240623
2283	USA_DISC_SW-0003241216
2284	USA_DISC_SW-0003242572
2285	USA_DISC_SW-0003243493
2286	USA_DISC_SW-0003243498
2287	USA_DISC_SW-0003243925
2288	USA_DISC_SW-0003244187
2289	USA_DISC_SW-0003244677
2290	USA_DISC_SW-0003245079
2291	USA_DISC_SW-0003245443
2292	USA_DISC_SW-0003246093
2293	USA_DISC_SW-0003246319
2294	USA_DISC_SW-0003246792
2295	USA_DISC_SW-0003247167
2296	USA_DISC_SW-0003247752
2297	USA_DISC_SW-0003247791
2298	USA_DISC_SW-0003247860
2299	USA_DISC_SW-0003248098
2300	USA_DISC_SW-0003248225
2301	USA_DISC_SW-0003248535
2302	USA_DISC_SW-0003249279
2303	USA_DISC_SW-0003249378
2304	USA_DISC_SW-0003249889
2305	USA_DISC_SW-0003250067
2306	USA_DISC_SW-0003250349
2307	USA_DISC_SW-0003250554
2308	USA_DISC_SW-0003250919
2309	USA_DISC_SW-0003251081
2310	USA_DISC_SW-0003251175
2311	USA_DISC_SW-0003251721
2312	USA_DISC_SW-0003252474
2313	USA_DISC_SW-0003252845
2314	USA_DISC_SW-0003253331
2315	USA_DISC_SW-0003253684
2316	USA_DISC_SW-0003254074
2317	USA_DISC_SW-0003256055
2318	USA_DISC_SW-0003256311
2319	USA_DISC_SW-0003259673
2320	USA_DISC_SW-0003260449

Exhibit A

Page 30

#	Bates Number
2321	USA_DISC_SW-0003262039
2322	USA_DISC_SW-0003262519
2323	USA_DISC_SW-0003263243
2324	USA_DISC_SW-0003263329
2325	USA_DISC_SW-0003263487
2326	USA_DISC_SW-0003263539
2327	USA_DISC_SW-0003263610
2328	USA_DISC_SW-0003263835
2329	USA_DISC_SW-0003264071
2330	USA_DISC_SW-0003264277
2331	USA_DISC_SW-0003264462
2332	USA_DISC_SW-0003264483
2333	USA_DISC_SW-0003264711
2334	USA_DISC_SW-0003264923
2335	USA_DISC_SW-0003266737
2336	USA_DISC_SW-0003267644
2337	USA_DISC_SW-0003268241
2338	USA_DISC_SW-0003269187
2339	USA_DISC_SW-0003269785
2340	USA_DISC_SW-0003269836
2341	USA_DISC_SW-0003270021
2342	USA_DISC_SW-0003270305
2343	USA_DISC_SW-0003270897
2344	USA_DISC_SW-0003271168
2345	USA_DISC_SW-0003271566
2346	USA_DISC_SW-0003272357
2347	USA_DISC_SW-0003272654
2348	USA_DISC_SW-0003273177
2349	USA_DISC_SW-0003273344
2350	USA_DISC_SW-0003274175
2351	USA_DISC_SW-0003274287
2352	USA_DISC_SW-0003275508
2353	USA_DISC_SW-0003275725
2354	USA_DISC_SW-0003275920
2355	USA_DISC_SW-0003276030
2356	USA_DISC_SW-0003276097
2357	USA_DISC_SW-0003276338
2358	USA_DISC_SW-0003276772
2359	USA_DISC_SW-0003278050
2360	USA_DISC_SW-0003278627

#	Bates Number
2361	USA_DISC_SW-0003280049
2362	USA_DISC_SW-0003280823
2363	USA_DISC_SW-0003280976
2364	USA_DISC_SW-0003281855
2365	USA_DISC_SW-0003282049
2366	USA_DISC_SW-0003282675
2367	USA_DISC_SW-0003282770
2368	USA_DISC_SW-0003282787
2369	USA_DISC_SW-0003282966
2370	USA_DISC_SW-0003284352
2371	USA_DISC_SW-0003287177
2372	USA_DISC_SW-0003287366
2373	USA_DISC_SW-0003287455
2374	USA_DISC_SW-0003293122
2375	USA_DISC_SW-0003293399
2376	USA_DISC_SW-0003296263
2377	USA_DISC_SW-0003297047
2378	USA_DISC_SW-0003297445
2379	USA_DISC_SW-0003297453
2380	USA_DISC_SW-0003297456
2381	USA_DISC_SW-0003297468
2382	USA_DISC_SW-0003297544

EXHIBIT B



U.S. Department of Justice

United States Attorney

Eastern District of Pennsylvania

Lesley S. Bonney
Direct Dial: (215) 861-8562
Facsimile: (215) 861-8618
E-mail Address: lesley.bonney@usdoj.gov

615 Chestnut Street
Suite 1250
Philadelphia, Pennsylvania 19106-4476
(215) 861-8200

March 1, 2024

VIA Email

Defense Counsel

Distribution List Attached

Re: *United States v. Bhaskar Savani, et al.*
Criminal No. 23-16

Dear Counsel:

The government's "5th Wave" of discovery is ready for production to you. This production includes approximately 450,000 documents that were recently released to the investigative team from the filter review, documents from AmeriHealth Caritas, agent reports, and subpoena returns, all consistent with the government's ongoing discovery obligations.

Due to the size of the production (a terabyte (1,000GB) in volume and encompassing approximately 630,000 documents), we will need to provide the production to you via 2TB hard drives. Accordingly, please send your hard drives to the attention of Stephanie Shipe at the United States Attorney's Office, 615 Chestnut Street, Suite 1250, Philadelphia, PA 19106. As you will recall from prior productions, your hard drive must be encrypted unless you plan to personally retrieve the drive from our office once the discovery is loaded. Please make sure that your hard drive is labeled with your client's name so that we can keep track, and for security reasons, please email pins or passwords needed to access your hard drive to Stephanie Shipe at Stephanie.Shipe@usdoj.gov. In your email, please include your client's name to facilitate matching passwords/pins with hard drives. Please do not send passwords/pins in the same package as the hard drive.

An index of all bates labeled documents will be included within the production.

All documents being produced in this discovery wave are subject to protection provided in the Order for Protection and Amended Order for Protection.

Sincerely yours,

JACQUELINE C. ROMERO
United States Attorney

/s Lesley S. Bonney

Lesley S. Bonney
Assistant United States Attorney

Defense Counsel Distribution List

Via Email

rchapman@chapmanlawgroup.com and
mlawhon@chapmanlawgroup.com

Ronald W. Chapman II
Matthew B. Lawhon
CHAPMAN LAW GROUP
1441 W. Long Lake RD., STE. 310
Troy, MI 48098

Via Email jdm@mancanolaw.com

Joseph D. Mancano
Law Offices of Joseph D. Mancano Mancano
Law, PLLC
353 West Lancaster Avenue Suite 300
Wayne, PA 19087

Counsel for Defendant Bhaskar Savani

Via Email msullivan@ashcroftlawfirm.com and nlevesque@ashcroftlawfirm.com

Michael J. Sullivan
Nicole M. Levesque
Ashcroft Law Firm, LLC
200 State Street 7th Floor
Boston, MA 02109

Via Email jlueddeke@reedsmith.com

Julia Lueddeke
Reed Smith
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103

Via Email sesterbrook@reedsmith.com

Scott M. Esterbrook
Reed Smith, LLP
2500 One Liberty Place
1650 Market Street
Philadelphia, PA 19103

Counsel for Defendant Arun Savani

Via Email wdestefano@saxtonstump.com

William DeStefano
Saxton & Stump
100 Deerfield Lane
Suite 240
Malvern, PA 19355

Via Email tpawelski@saxtonstump.com

TERRI A. PAWELSKI
Saxton & Stump
123 South Broad Street
Suite 2800
Philadelphia, PA 19109

Counsel for Defendant Niranjan Savani

Via Email pegan@foxrothschild.com and sromeo@foxrothschild.com

Patrick J. Egan
Saverio S. Romeo
FOX ROTHSCHILD LLP
2000 Market Street, 10TH FL
Philadelphia, PA 191079

Via Email shaaz@foxrothschild.com

Samuel A. Haaz
FOX ROTHSCHILD LLP
10 Sentry Parkway, Suite 200
P.O. BOX 3001
Blue Bell, PA 19422-3001

Counsel for Defendant Sunil Philip

Via Email dlombardo@thehenryfirm.biz

Todd Henry
THE HENRY LAW FIRM
1500 Walnut Street, Suite 1060
Philadelphia, PA 19102

Counsel for Amen Dhyllon

Via Email tclarkson@griffindurham.com

J. Thomas “Tom” Clarkson
Griffin Durham Tanner & Clarkson
75 14th Street NE, Suite 2130
Atlanta, GA 30309

Via Email MWitsch@atllp.com

Michael Christopher Witsch
Armstrong Teasdale, LLP
One Commerce Square,
2005 Market Street, 29th Floor
Philadelphia, PA 19103

Counsel for Defendant Jon Julian

Via Email lbozz@hotmail.com

Lawrence J. Bozzelli
THE BOZZELLI LAW FIRM
211 N. 13TH Street, Suite 701
Philadelphia, PA 19107

Counsel for Defendant Bharatkumar Parasana

Via Email dfautsch@weinhardtlaw.com & etursi@weinhardtlaw.com

David Fautsch
Elisabeth A. Tursi, Esquire
The Weinhardt Law Firm
2600 Grand Avenue, Suite 450
Des Moines, IA 50312

Via Email mcmahonlaw@hotmail.com

John J. McMahon, Jr.
LAW OFFICE OF JACK MCMAHON
139 North Croskey Street
Philadelphia, PA 19103

Counsel for Defendant Piyusha Patel

Via Email lmskipper@duanemorris.com & nadimarco@duanemorris.com

Leigh Michael Skipper
Nicholas DiMarco
Duane Morris LLP
30 South 17th Street
Philadelphia, PA 19103

Counsel for Defendant Aleksandra Radomiak

Via Email cl@laguzzilaw.com

Carina Laguzzi
LAGUZZI LAW PC
PO BOX 30095
Philadelphia, PA 19103

Counsel for Defendant Vivek Savani

Via Email michael_mccrossen@fd.org & timothy_wright@fd.org

Michael Brendan Mccrossen
Timothy A. Wright
Federal Community Defender Office Trial Unit
601 Walnut Street Ste 540
Philadelphia, PA 19106

Counsel for Defendant Hiteshkumar Goyan

Via Email courtnotices@cipparonelaw.com

Rocco C. Cipparone, Jr
Rocco C. Cipparone, Jr., Law Offices
157 Bridgeton Pike
Suite 200-320
Mullica Hill, NJ 08062

Counsel for Defendant Susan Malpartida